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Receiver for Receivership Entities*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

TITANIUM BLOCKCHAIN
INFRASTRUCTURE SERVICES,
INC.; EHI INTERNETWORK AND
SYSTEMS MANAGEMENT, INC.
aka EHI-INSM, INC.; and MICHAEL
ALAN STOLLERY aka MICHAEL
STOLLAIRE,

Defendants.

Case No. 18-4315 DSF (JPRx)

**SECOND INTERIM FEE
APPLICATION OF HOLLAND &
KNIGHT LLP, AS COUNSEL TO
RECEIVER, FOR ALLOWANCE OF
COMPENSATION AND
REIMBURSEMENT OF EXPENSES;
CERTIFICATION OF COUNSEL IN
SUPPORT THEREOF; [PROPOSED]
ORDER**

[FRCP 66; L.R. 66-7]

Date: September 13, 2021
Time: 1:30 p.m.
Ctrm: 7D
Judge: Hon. Dale S. Fischer

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on August 16, 2021, at 1:30 p.m., or as soon thereafter as the matter may be heard before the Honorable Dale S. Fischer, in Courtroom 7D of the United States District Court, Central District of California, Western Division, 350 West 1st Street, 6th Floor, Los Angeles, California, 90012, Holland & Knight LLP (“Counsel” or “H&K”), counsel to Josias Dewey, as Court-appointed Receiver (the “Receiver”) for the estates of Defendant Titanium Blockchain Infrastructure Services, Inc. and its subsidiaries and/or affiliates (collectively, the “Receivership Entities”), will and hereby does submit this second interim fee application (the “Application”).

This Application is submitted pursuant to paragraphs XI(F) and XVII of this Court’s Order Appointing Permanent Receiver, entered May 30, 2018 (the “Permanent Receivership Order”), Rule 66 of the Federal Rules of Civil Procedure, and Local Rule 66-7. This Application is made following the conference of counsel pursuant to Local Rule 7-3 which took place beginning on July 13, 2021.

This Application is based upon this Notice of Application and Application, the Arguments and Authorities in Support of Fee Application incorporated therein, the Certification of Counsel, all papers and records on file herein, and such other matters as may be presented to the Court at or before the hearing on this Application.

Dated: August 2, 2021

Respectfully submitted,

HOLLAND & KNIGHT LLP

/s/ Kristina S. Azlin

/s/ Jose A. Casal

Jose A. Casal (*pro hac vice*)
Kristina S. Azlin (SBN 235238)
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*Attorneys for Josias Dewey, Court-appointed
Receiver for Receivership Entities*

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**SECOND INTERIM FEE APPLICATION OF HOLLAND & KNIGHT LLP,
AS COUNSEL TO RECEIVER, FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Pursuant to paragraphs XI(F) and XVII of this Court's Order Appointing Permanent Receiver, entered May 30, 2018 (the "Permanent Receivership Order") (Dkt. 48), Rule 66 of the Federal Rules of Civil Procedure, and Local Rule 66-7, Holland & Knight LLP ("Counsel" or "H&K"), counsel to Josias Dewey, as Court-appointed Receiver (the "Receiver") for the estates of Defendant Titanium Blockchain Infrastructure Services, Inc. ("TBIS") and its subsidiaries and/or affiliates (collectively, the "Receivership Entities"), hereby submits this second interim fee application (the "Application").

In support of this Application, H&K respectfully states the following:

I. SUMMARY OF FEE REQUEST

1. This interim fee application covers the period from June 23, 2018 through December 31, 2019 (the "Second Application Period")¹ and is submitted in accordance with the Permanent Receivership Order, the Local Rules of this Court, and the Billing Instructions for Receivers in Civil Actions Commenced by the United States Securities and Exchange Commission (the "Billing Instructions").

2. On April 4, 2019, this Court entered an Amended Order (Dkt. 80) Partially Granting First Interim Fee Application of Holland & Knight LLP, as Counsel to the

¹ The anticipated Third Application Period will run from January 1, 2020 through approximately the end of the claims administration phase, scheduled to conclude around the beginning of Q4 2021. The Receiver has taken substantial steps in furtherance of administering the Estate during this time, including but not limited to establishing a claims administration process among the first of its kind and moving the Court for approval of the same, setting a Claims Bar Date and giving notice to the Parties and public of the Claims Bar Date and claims process, publishing (and re-publishing) information about the claims administration process, creating a public-facing webpage and portal for potential creditors and victims of the fraud described herein, overseeing professionals engaged in administration and validation of claims, and actually opening the claims period. After the Claims Bar Date, the Receiver will move the Court for an Order approving a distribution plan.

Receiver, for Allowance of Compensation and Reimbursement of Expenses (the “First Interim Fee Application”), allowing and approving H&K’s fees and expenses for the period of May 23, 2018 through June 22, 2018 (the “First Application Period”), on an interim basis, in the amounts of \$52,828.49 for attorneys’ fees incurred by H&K and \$66,451.25 for expenses (which reflected the amount invoiced for forensic services rendered by Kroll Cyber Security), for a total of \$119,279.74 (the “First Interim Allowance”).² H&K received full payment of the First Interim Allowance (the “First Interim Payment”). Since the First Application Period, Counsel has rendered additional services to the Receiver for the benefit of the Receivership Entities, as discussed more fully herein.

3. Through this Application, H&K seeks approval, on an interim basis, of \$116,857.12 in fees and \$16,734.49 in expenses (inclusive of \$10,170.00 for accounting services rendered by Grobstein Teeple LLP and invoiced to H&K) for the Second Application Period, for a total of **\$133,591.61** (the “Fees”).

II. STANDARDIZED FUND ACCOUNTING REPORT

4. Attached as **Exhibit A** is the Standardized Fund Accounting Report (SFAR) for the Receivership Entities for the period from January 1, 2019 through June 30, 2021 (the “SFAR Reporting Period”).³

² Pursuant to paragraph XVII of the Permanent Receivership Order, fees and costs for the Receiver and all others retained to assist him in the administration and liquidation of the estate were capped at \$125,000 for the initial 30 days of the receivership (the “Fee Cap”). H&K actually incurred \$144,369.52 in fees and \$72,171.51 in expenses, for a total of \$216,541.03, during the First Application Period, but limited that application to \$125,000 pursuant to the Fee Cap. H&K does not intend to make an application for the remaining \$91,541.03 in fees incurred over the Fee Cap during the First Application Period.

³ While the Second Application Period runs through December 31, 2019, the SFAR Reporting Period runs through the end of the most recent quarter, providing a more accurate and complete picture of the current case status.

III. CASE STATUS

5. Cash On Hand: The amount of cash on hand in the Receiver's bank account is \$21,180.60 as of the end of the SFAR Reporting Period. These funds were received by taking control of TBIS's bank accounts held at US Bank (\$58,583.45) and JPMorgan Chase (\$252,208.40).

Other Assets: In addition to the cash on hand, the Receiver has also taken possession, or has caused third-party custodians to freeze, the following assets:

Asset	Units (if applicable)	Unit Value (as of 12/31/2018)	Aggregate Value (as of 12/31/2018)	Unit Value (as of 06/30/2021, end of SFAR Period)	Aggregate Value (as of 06/30/2021, end of SFAR Period)
Bitcoin (BTC)	113.471	\$3,819.7400	\$433,429.72	\$34,197.5500	\$3,880,430.20
Bitcoin SV (BSV)	1.55416	\$87.4500	\$135.91	\$142.4200	\$221.34
Ether (ETH)	2151.37	\$136.8200	\$294,350.44	\$2,149.8700	\$4,625,165.82
Zcash (ZEC)	7.9046	\$58.6000	\$463.21	\$124.3900	\$983.25
Litecoin (LTC)	4358.11	\$81.6100	\$355,665.36	\$139.2900	\$607,041.14
Bitcoin Cash (BCH)	0.0004694	\$164.8500	\$0.08	\$510.0200	\$0.24
Electroneum (ETN)	21035514	\$0.0076	\$160,332.69	\$0.0063	\$132,060.96
OMG (OMG)	51.5600014	\$1.4316	\$73.81	\$4.2172	\$217.44
Computer equipment, televisions, phones (est)			\$5,000.00		\$2,000.00
		Total	\$1,249,451.22		\$9,248,120.39

6. The Receiver has established multiple cryptocurrency wallets to hold the cryptocurrencies listed above and is either (i) in possession of the private keys associated with these wallets, or (ii) has caused a third party custodian to freeze such assets. As of

1 the end of the SFAR Reporting Period, and based on values taken from a market
2 aggregator, the value of the cryptocurrency assets held by or for the benefit of the
3 Receivership Estate is approximately \$9,115,841.76. This figure should be taken with
4 caution because the value of cryptocurrency assets fluctuates rapidly, and the markets for
5 some cryptocurrencies can be opaque and illiquid, and subject to market manipulation.
6 Furthermore, some assets, like Electroneum (ETN), may constitute unregistered
7 securities, making it difficult, or impossible, for the Receiver to liquidate to fiat
8 currency.

9 7. Pursuant to the Receiver's November 1, 2019 Motion for Leave to Partially
10 Liquidate Assets (Dkt. 91) (the "Partial Liquidation Motion"), and the Court's
11 November 22, 2019 Order granting the Partial Liquidation Motion (Dkt. 93), the
12 Receiver obtained authorization from the Court to partially liquidate the cryptocurrency
13 assets listed above in order to pay current and future expenses for which the Receiver
14 had insufficient cash on hand.

15 8. Expenses: The Receiver has incurred administrative expenses as a result of
16 his efforts to marshal and preserve the assets of the Receivership. Expenses for the
17 Second Application Period were advanced by H&K and by Grobstein Teeple LLP, as set
18 forth in attached **Exhibit E**. Lastly, the Receivership has advanced (i) approximately
19 \$90,427.62 in payroll taxes owed to the IRS for both pre- and post-receivership wages,
20 and (ii) certain ordinary course expenses, such as costs incurred in connection with
21 server hosting fees, incurred by the Receiver in the aggregate amount of \$5,000.00 in
22 administering the Receivership Entities.

23 9. Creditor Claims: As set forth in the Receiver's Notice to Court Regarding
24 Status of Claims Process and Claims Bar Date, filed on March 22, 2021 (the "Claims
25 Process Status Notice") (Dkt. 102), the creditor claims process is underway pursuant to
26 the procedures developed by the Receiver and approved by this Court's August 21, 2020
27 Order Approving Claims Process and Bar Date (Dkt. 96) for overseeing the
28

1 administration of claims of creditors, investors who acquired unregistered securities
2 from TBIS and certain investors otherwise harmed by TBIS's fraud.

3 10. As detailed in the Claims Process Status Notice, the Receiver, claims
4 administrator RCB Fund Services LLC ("RFS"), and Counsel have worked diligently to
5 test, validate, and ultimately deploy a first-of-its-kind automated validation-based claims
6 process system (the "Claims Portal"). The Claims Portal involves using the record of the
7 fraudulent transaction – the sale of unregistered securities represented by virtual ERC-20
8 cryptocurrency tokens which exist on the public Ethereum blockchain network
9 ("Ethereum Network") – to validate the legitimacy of claims and prevent fraudulent or
10 duplicative claims. The Ethereum Network is the decentralized transaction ledger on
11 which Ether, one of the world's most popular cryptocurrencies, exists. The Ethereum
12 Network reflects the transactions occurring insofar as it is, in and of itself, a ledger of
13 transactions.

14 11. Pursuant to the Court's December 8, 2020 Order Appointing a Claims
15 Administrator (Dkt. 100), the Receiver engaged RFS as claims administrator for
16 purposes of effectuating the Court's August 21, 2020 Order approving the claims
17 process. On December 15, 2020, the Court granted TBIS's and the Securities and
18 Exchange Commission's ("SEC") Joint Stipulation to Extend Claims Bar Date (Dkt.
19 101). Pursuant to that Order, the Court established that the claims period for potential
20 claimants of the Receivership Entities would run for 180 calendar days following
21 publication of the Claims Process Notice (the "Notice"). Any claims submitted after
22 11:59 p.m. Pacific Time on the date 180 calendar days following initial publication of
23 the Notice would be barred (the "Bar Date").

24 12. On February 12, 2021, the Receiver published the initial Notice of the
25 Claims Process and Bar Date on PR Newswire and Twitter, thus establishing the Claims
26 Bar Date as August 11, 2021. In addition to the initial Notice, the Receiver has provided
27 direct email notices to potential claimants whose email addresses are known and has re-
28 published the Notice on additional occasions, through multiple channels. The initial

1 round of publication and direct emails reached a wide audience and resulted in a number
2 of claims being filed, as evidenced by both the number of claims authenticated and
3 submitted to date and the geographic diversity of the claimants. The Receiver intends to
4 continue making subsequent publications of the Notice throughout the claims period,
5 including on PR Newswire, Coin Telegraph, and Twitter.

6 13. The Claims Portal went live on February 27, 2021 and has been receiving
7 claims since that date, and it will remain open until 11:59 p.m. Pacific Time on the Bar
8 Date. The Receiver has been reviewing and validating submitted claims and responding
9 to inquiries from claimants and potential claimants.

10 14. As of June 30, 2021, 410 claims submitted through the Claims Portal
11 cleared validation, meaning that the claims process deemed them to be legitimate claims
12 arising from purchase or acquisition of unregistered TBIS securities. An additional 367
13 claims had been created, but not yet finalized, meaning that claimants still had to take
14 additional steps to finish the claims submission (e.g., upload documentation). 58 claims
15 were deemed to be duplicates.⁴

16 15. After the Bar Date has passed and the Receiver has reviewed and validated
17 submitted claims, he will submit a separate motion seeking approval for the distribution
18 of assets to claimants in amounts to be determined at a later date.

19 16. The Receiver has negotiated with additional third parties, as well as the
20 Defendant, with respect to certain cryptocurrency assets that were transferred from a
21 wallet owned by TBIS to a wallet owned by a third-party and hosted by Coinbase. This
22 cryptocurrency is the property of TBIS and therefore should be transferred to the
23 Receivership. The Receiver successfully negotiated with all third-parties involved,
24 including Defendant, to enter into a stipulation releasing the cryptocurrency to the
25 Receivership, which was approved pursuant to the Court's April 10, 2019 Order
26

27
28 ⁴ The Receiver can provide updated information if needed at the time of hearing or
reply.

1 Granting Stipulation and Request for Modification of Asset Freeze To Allow Release of
2 Frozen Assets (Dkt. 82).

3 17. The Receiver has, and continues to, pursue the recovery of certain
4 cryptocurrency assets (approximately 477.647 Ethereum and 38.75387 Bitcoin, valued at
5 approximately \$2,352,166.36 as of the end of the SFAR Reporting Period) that were
6 stolen from a wallet owned by TBIS and transferred to a wallet owned by a third-party
7 and hosted by HitBTC (an offshore cryptocurrency exchange which, according to its
8 website, was headquartered in Hong Kong but is now operating out of Chile and the
9 Seychelles) (the “HitBTC Crypto”). The Receiver, using certain forensic cryptocurrency
10 software tools, was able to trace the HitBTC Crypto through a series of complex
11 transfers and, ultimately, was able to identify the individual owner of the wallet. The
12 Receiver successfully negotiated with HitBTC to freeze the HitBTC Crypto (which, as
13 of the date hereof, appears to remain frozen on the exchange), but despite repeated
14 attempts to secure the transfer of the HitBTC Crypto to the Receivership (including
15 filing suit through local counsel in Hong Kong to order HitBTC to transfer the HitBTC
16 Crypto to the Receivership) HitBTC ceased communications with the Receiver (and its
17 various counsel). The Receivership continues to pursue recovery of the HitBTC Crypto
18 and has established communications with counsel in the Seychelles to explore remedies
19 it may seek in that jurisdiction.

20 **IV. BACKGROUND**

21 18. On May 22, 2018, the Securities and Exchange Commission filed a
22 complaint against Defendants Titanium, EHI Internetwork and Systems Management,
23 Inc., also known as EHI-INSM, Inc.(“EHI”), and Michael Alan Stollery, also known as
24 Michael Stollaire (collectively “Defendants”), along with an application for the
25 appointment of a receiver for the Receivership Entities.

26 19. The Court concluded that the appointment of a receiver in this action was
27 necessary and appropriate for the purposes of marshaling and preserving all assets,
28 tangible and intangible, that are owned, controlled or possessed by the Receivership

1 Entities, and accordingly, on May 23, 2018, the Court entered a Temporary Restraining
2 Order (the “TRO”) and Orders (1) Freezing Assets; (2) Prohibiting the Destruction or
3 Alteration of Documents; (3) Granting Expedited Discovery; (4) Requiring Accountings;
4 and (5) Appointing a Temporary Receiver (the “Temporary Receivership Order”) (Dkt.
5 2), appointing Josias N. Dewey as temporary receiver for the Receivership Entities. On
6 May 24, 2018, all Defendants were served with the summons, complaint, TRO, and
7 Temporary Receivership Order. (Dkt. 49, 50, 51.)

8 20. On May 30, 2018, the Court entered the Permanent Receivership Order
9 (together with the Temporary Receivership Order, collectively, the “Receivership
10 Order”) (Dkt. 48). The Defendants consented to the entry of the Permanent
11 Receivership Order (Dkt. 47.)

12 21. On June 6, 2018, the Court entered orders approving the Receiver’s
13 decision to employ H&K as legal counsel and Kroll Cyber Security, LLC (“Kroll”) as a
14 forensic and investigative consultant, to assist him in carrying out his duties as the
15 Receiver. H&K and Kroll began performing services for the Receiver on or about May
16 23, 2018.

17 22. As set forth in more detail in the Receiver’s Initial Status Report for
18 Receivership Estate of Titanium Blockchain Infrastructure Services, Inc., filed on June
19 25, 2018 (the “Initial Status Report”), the Receiver and his advisors focused most of
20 their initial efforts on investigating, identifying, collecting, and preparing an inventory of
21 assets of the Receivership Entities. (Dkt. 57.) The principal assets recovered include
22 cryptocurrency, U.S. currency, electronic data, and physical assets such as computer
23 equipment.

24 23. On May 24, 2018, the Receiver and his legal counsel, together with the
25 assistance of Kroll, were able to seize and search computer equipment, mobile phones
26 and other electronic devices belonging to the Receivership Entities and interview Mr.
27 Stollery and certain of his associates at their offices in Sherman Oaks, California and
28 Springfield, Oregon. (Dkt. 57.)

1 24. Based on information gained through the search and interviews, the
2 Receiver identified and took control of certain cryptocurrency assets. In addition, the
3 Receiver collected other assets at the Sherman Oaks site and from an office site in
4 Springfield, Oregon that had been leased on behalf of Titanium. (Dkt. 57.)

5 25. The Initial Status Report and the First Interim Fee Application provide
6 additional detail on the Receiver's initial efforts and actions taken in order to identify
7 and secure assets of the Receivership and to work on identifying additional assets for
8 recovery. (Dkt. 57, 76.)

9 26. On May 10, 2019, the SEC reached bifurcated settlements with EHI and
10 Stollaire, which were signed and filed with the Court (Dkt. 83 and 84 respectively),
11 whereby EHI and Stollaire consented, without admitting or denying the allegations of
12 the complaint, to the entry of judgments on all claims against them and to the issuance of
13 permanent injunctions against them on those claims, as well as to the issuance of a
14 permanent injunction enjoining Stollaire from directly or indirectly, participating in the
15 offering of digital or other securities. Pursuant to the terms of the bifurcated settlements,
16 EHI and Stollaire agreed that the amounts of disgorgement and civil penalty they must
17 pay shall be determined by the Court upon motion of the SEC, assuming no further
18 settlement can be reached with the SEC as to those amounts.

19 27. On May 14, 2019, the Court entered its Judgment as to Defendant EHI,
20 which, among other things, (i) permanently restrains and enjoins EHI from violations of
21 Section 17(a) of the Securities Act of 1933 ("Securities Act") [15 U.S.C. §§ 78j(b) and
22 78o(a)] and Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act") [15
23 U.S.C. §§ 78j(b) and 78o(a)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5]; and
24 (ii) orders EHI to pay disgorgement, prejudgment interest thereon, and a penalty in
25 amounts to be determined by the Court upon motion of the SEC (Dkt. 86). EHI
26 consented to such Judgment. (Dkt. 84.)

27 28. On May 14, 2019, the Court entered its Judgment as to Defendant Stollaire,
28 which, among other things, (i) permanently restrains and enjoins Stollaire from

1 violations of Sections 5(a), 5(c), and 17(a) of the Securities Act and Section 10(b) of the
2 Exchange Act and Rule 10b-5 thereunder; (ii) permanently restrains and enjoins Stollaire
3 from directly or indirectly, including, but not limited to, through any entity owned or
4 controlled by Stollaire, participating in the offering of digital or other securities,
5 provided, however, that such injunction shall not prevent Stollaire from purchasing or
6 selling digital or other securities for himself or his own personal account; and (iii) orders
7 Stollaire to pay disgorgement, prejudgment interest thereon, and a penalty in amounts to
8 be determined by the Court upon motion of the SEC (Dkt. No. 87). Stollaire consented
9 to such Judgment. (Dkt. 83.)

10 29. On May 22, 2019, the Receiver executed a Consent of Defendant Titanium
11 Blockchain Infrastructure Services, Inc. (Dkt. 89), consenting to the entry of a Judgment
12 against TBIS that permanently restrains and enjoins TBIS from violations of Sections
13 5(a), 5(c), and 17(a) of the Securities Act and Section 10(b) of Exchange Act and Rule
14 10b-5 thereunder; (b) orders TBIS to pay disgorgement, prejudgment interest thereon,
15 and a penalty in amounts to be determined by the Court upon motion of the SEC. The
16 Court entered its Judgment as to Defendant TBIS on May 23, 2019 (Dkt. 90).

17 30. Pursuant to the Receiver's November 1, 2019 Partial Liquidation Motion
18 (Dkt. 91), and the Court's November 22, 2019 Order granting the Partial Liquidation
19 Motion (Dkt. 93), the Receiver obtained authorization from the Court to partially
20 liquidate the cryptocurrency assets listed in Section III above in order to pay current and
21 future expenses for which the Receiver had insufficient cash on hand.

22 **V. SUMMARY OF SERVICES PROVIDED**

23 31. H&K has continued to assist the Receiver with all aspects of his duties in
24 this case during the Second Application Period, including continued work on
25 investigating, identifying, collecting, and preparing an inventory of assets of the
26 Receivership Entities including cryptocurrency, U.S. currency, electronic data, and
27 physical assets such as computer equipment, negotiations with third parties to stipulate
28

1 to the recovery of additional cryptocurrency assets, and initial work on developing
2 claims administration and distribution procedures.

3 32. Additional actions in which H&K has assisted the Receiver include, but are
4 not limited to, the following:

- 5 a. Establishing a Receivership website (<http://tbis.io>) and an email
6 address (TBIS@hklaw.com) so that TBIS's investors and other creditors
7 can receive information pertaining to the Receivership;
- 8 b. Identifying cryptocurrency wallets and/or accounts controlled by the
9 Defendants containing various cryptocurrencies (bitcoin, Bitcoin Cash,
10 Ether, Litecoin, Dash, Electroneum, ZCash, BAR and TBAR), and either
11 transferring such cryptocurrency to wallets controlled by the Receiver or
12 causing third party custodial agents to freeze such accounts;
- 13 c. Taking control of TBIS's U.S. Bank account and having the entire
14 account balance transferred to an account established by the Receiver;
- 15 d. Taking control of Titanium's JPMorgan Chase Bank account and
16 requesting that the entire account balance be transferred to an account
17 established by the Receiver;
- 18 e. Securing access to Mr. Stollery's safe deposit box and the retrieval
19 of relevant information and assets from same;
- 20 f. Reviewing TBIS's provisional patent application and GitLab
21 account, and conducting telephone interviews with TBIS's chief
22 technology officer, to evaluate the current value of intellectual property
23 and TBIS as a going concern;
- 24 g. Engaging Kroll to inventory and image computers and phones
25 collected from TBIS's offices in Sherman Oaks, California, and
26 Springfield, Oregon;

- h. Interviewing TBIS's chief operating officer regarding business operations and matters pertaining to theft of virtual currencies from the Defendant TBIS;
- i. Obtaining information from special agents with the United States Secret Service and Federal Bureau of Investigations regarding the theft of virtual currencies from the Defendant TBIS;
- j. Securing personal property owned or leased by TBIS at both of its offices;
- k. Changing the locks at both commercial offices of Defendant TBIS;
- l. Negotiating with commercial landlords to secure the termination of TBIS's leases;
- m. Serving written notices on cryptocurrency exchanges and other third parties to locate additional assets, including certain overseas exchanges;
- n. Analyzing payroll and employment matters, including status of employment tax payments;
- o. Terminating the employment of employees of Defendant TBIS;
- p. Communicating with hundreds of prospective claimants about their potential claims and answering their questions;
- q. Establishing a first-of-its-kind claims process that involves an semi-automated method of validating certain claims by utilizing publicly available information on the Ethereum blockchain;
- r. Seeking, engaging and directing local counsel in Hong Kong and the Seychelles to pursue the recovery of the HitBTC Crypto;
- s. Engaging the services of, and work closely with, RFS to assist the Receiver, and its counsel, in the claims, validation and distribution process, including the development of a unique electronic claims portal, allowing the Receiver to reduce the time necessary to review and process a claim (as well as solving certain unique challenges in confirming claims pertaining

to transactions that took place on a pseudo-anonymous basis on a blockchain); and

t. Analyzing and troubleshooting hundreds of claim applications and questions submitted through the claim application portal.

33. Each of these tasks was reasonably necessary to identify and secure assets of the Receivership, to work on identifying additional assets for recovery, and to begin work on developing the procedures for overseeing the administration and payment of claims of creditors, investors who acquired unregistered securities from TBIS and certain investors otherwise harmed by TBIS's fraud.

VI. FEE APPLICATION

34. During the Second Application Period, H&K professionals provided services to the Receiver for the benefit of the Receivership Entities with a value of at least \$116,857.12 and incurred reimbursable expenses in the amount of \$16,734.49,⁵ for a total of \$133,591.61 in fees and expenses. Through this Application, H&K requests entry of an Order approving the Fees on an interim basis.

35. This Application is the second Interim Fee application that H&K has submitted in this matter. Below is a summary of prior fees and expenses requested, allowed, and paid to H&K to date:

Application; Date Filed	Period Covered	Requested		Allowed		Paid	
		Fees	Expenses	Fees	Expenses	Fees	Expenses
First Interim; 3/1/2019 (Docket No. 76)	5/23/2018 – 6/22/2018	\$52,828.49 ₆	\$72,171.51	\$52,828.49	\$66,451.25	\$52,828.49	\$66,451.25

⁵ These expenses include \$10,170 for accounting services rendered by Grobstein Teeple LLP and invoiced to H&K.

⁶ H&K actually incurred \$144,369.52 in fees and \$72,171.51 in expenses, for a total of \$216,541.03, during the First Application Period, but limited that application to \$125,000 pursuant to the Fee Cap. H&K does not intend to make an application for the remaining \$91,541.03 in fees incurred over the Fee Cap during the First Application Period.

		Requested		Allowed		Paid	
TOTALS:		\$52,828.49	\$72,171.51	\$52,828.49	\$66,451.25	\$52,828.49	\$66,451.25

36. No balance remains outstanding from the prior fee period.

37. Through this Application, H&K further requests entry of an Order authorizing the Receiver to make payment to H&K in the amount of \$133,591.61.

38. The names, hours worked, hourly billing rates, and total fees of all H&K professionals who have billed time to this matter, excluding the Receiver, are listed in the attached **Exhibit B**. Standard H&K hourly billing rates have been discounted by 10%. Travel time has been billed at 50% of H&K's standard hourly billing rates in accordance with the Billing Instructions, and those reduced rates have been further discounted by 10%. H&K's actual fees for the Second Application Period have been reduced by at least \$13,715.38 pursuant to this discount.

39. In further accordance with the Billing Instructions, H&K professionals have separately categorized their services by task. The attached **Exhibit C** summarizes the respective number of hours incurred relative to each task category during the Second Application Period.

40. The services rendered by H&K are itemized fully in the contemporaneously maintained electronic time records attached hereto as **Exhibit D**.

41. An itemization of reasonable and reimbursable expenses incurred by H&K at the levels set forth in accordance with the Billing Instructions, including a copy of the Grobstein Teeple LLP invoice included among those expenses, is attached hereto as **Exhibit E**. Further details on the services provided by Grobstein Teeple LLP are outlined in Exhibit E-1.

VII. POINTS AND AUTHORITIES IN SUPPORT OF FEE APPLICATION

42. The district court's "power to supervise an equity receivership and to determine the appropriate action to be taken in the administration of the receivership is

1 extremely broad.” *SEC v. Hardy*, 803 F.2d 1034, 1037 (9th Cir. 1986). That broad
2 authority “arises out of the fact that most receiverships involve multiple parties and
3 complex transactions.” *Id.*⁷ This “extremely broad” discretion “includes awards of
4 receivership fees, including attorneys’ fees.” *SEC v. Wang*, 2015 WL 12656904, at *3
5 (C.D. Cal., Feb. 17, 2015, No. CV 13-7553 JAK (SS)), citing *In re San Vincente*
6 *Medical Partners Ltd.*, 962 F.2d 1402, 1409 (9th Cir. 1992) (“The award of receivership
7 fees in an SEC action is analogous to the award of receivership fees in bankruptcy
8 proceedings, and we review the district court’s award for an abuse of discretion.”).

9 43. Decisions regarding the timing and amount of an award of fees and costs
10 are committed to the sound discretion of the Court. *See Drilling & Exploration Corp. v.*
11 *Webster*, 69 F.2d 416, 418 (9th Cir. 1934) (“The court appointing the receiver has full
12 power to fix the compensation of such receiver and the compensation of the receiver’s
13 attorney or attorneys.”); *Quilling v. Trade Partners, Inc.*, 572 F.3d 293, 301 (6th Cir.
14 2009) (“[T]he district court has wide discretion in distributing receivership assets.”);
15 *SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992) (rev’d in part on other grounds, 998
16 F.2d 922 (11th Cir. 1993)); *SEC v. Wang*, 2015 WL 12656904, at *1; *SEC v. Small*
17 *Business Capital Corp.*, 2014 WL 3920320, at *2 (N.D. Cal. Aug. 7, 2014).

18 44. An award of interim fees may be appropriate where, like here, a receiver or
19 the professionals employed by the receiver “regularly devote[] a portion of his time,
20 either daily or weekly, to the administration of the estate[.]” *In Re McGann Mfg. Co.*,
21 188 F.2d 110, 112 (3d Cir. 1951) (interim fees to bankruptcy trustee or his counsel); *see*
22 *also SEC v. Small Bus. Cap. Corp.*, No. 5:12-CV-03237 EJD, 2014 WL 1901257, at *1
23 (N.D. Cal. May 9, 2014) (granting interim fee application to receiver and receiver’s
24 counsel).

25
26
27 ⁷ *See also Id.* at 1037 (Recognizing that “case law involving district court
28 administration of an equity receivership (once the receivership is underway) is
sparse...”).

1 45. In allowing fees, a court should consider “the time, labor and skill required,
2 but not necessarily that actually expended, in the proper performance of the duties
3 imposed by the court upon the receiver[], the fair value of such time, labor and skill
4 measured by conservative business standards, the degree of activity, integrity and
5 dispatch with which the work is conducted and the result obtained.” *United States v.*
6 *Code Prods. Corp.*, 362 F.2d 669, 673 (3d Cir. 1966) (internal quotation marks omitted).
7 Moreover, an “award of interim fees is appropriate ‘where both the magnitude and the
8 protracted nature of a case impose economic hardships on professionals rendering
9 services to the estate.’” *SEC v. Small Bus. Cap. Corp.*, 2014 WL 1901257, at *2
10 (quoting *In re Alpha Telcom, Inc.*, No. 01–CV–1283–PA, 2006 WL 3085616, at *3
11 (D.Or. Oct. 27, 2006)).

12 46. In practical terms, when awarding interim fees, receiver and professional
13 compensation turns upon the result of an equitable, multi-factor balancing test involving
14 the “economy of administration, the burden that the estate may be able to bear, the
15 amount of time required, although not necessarily expended, and the overall value of the
16 services to the estate.” *Id.* (quoting *In re Imperial 400 Nat’l, Inc.*, 432 F.2d 232, 237 (3d
17 Cir. 1970)). Regardless of how this balancing test is formulated, no single factor is
18 determinative and “a reasonable fee is based [upon] all circumstances surrounding the
19 receivership.” *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F.Supp. 465,
20 480 (S.D. Tex. 1974). Generally, the starting point is to multiply the number of hours
21 expended by an hourly rate. *Southwestern Media, Inc. v. Rau*, 708 F.2d 419, 427 (9th
22 Cir. 1983) (bankruptcy case). The hourly rate is based on the rate the professional would
23 charge for comparable service in other matters. *Id.*

24 47. “As a general rule, the expenses and fees of a receivership are a charge
25 upon the property administered.” *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994)
26 (citing *Atl. Trust Co. v. Chapman*, 208 U.S. 360 (1908)); *see also SEC v. Nationwide*
27 *Automated Sys. Inc.*, CV 14-07249 SJO (FFMx), 2018 WL 11295810 (C.D. Cal. April
28 26, 2018) (quoting *Gaskill* and granting thirteenth interim fee applications of receiver

1 and counsel). These expenses include the fees and expenses of the Receiver's
2 professionals, including H&K.

3 48. In support of the application, H&K submits the above-referenced Exhibits
4 A-E for the Court's review, along with the Certification of Jose A. Casal addressing the
5 reasonableness of the rates charged and hours billed by professionals at H&K.

6 49. H&K has charged fees that are 10% less than the standard billing rates for
7 the professionals working on this matter, and those fees are at or below customary fees
8 charged by like professionals in their respective markets. H&K has billed all
9 reimbursable expenses at their actual costs with no mark-up added, and they are not
10 seeking overhead charges.

11 50. Further, pursuant to the Fee Cap, H&K's actual fees for the First
12 Application Period were previously reduced by \$91,541.03—which was an additional
13 63% discount for the services rendered during that prior application period.

14 51. As set forth above and in the Claims Process Status Notice, among other
15 filings, H&K has assisted the Receiver in performing various tasks that have added value
16 to the Receivership Entities. Each task was staffed and performed as efficiently as
17 possible. The fees and expenses sought in this Application are reasonable and were
18 necessary for the proper administration of the Receiver's duties.

19
20 **VIII. CONCLUSION**

21 H&K therefore respectfully requests that this Court enter an Order:

22 1. Allowing, on an interim basis, fees in the amount of \$116,857.12 and
23 reimbursement of expenses in the amount of \$16,734.49, for total compensation of
24 \$133,591.61;

25 2. Authorizing and directing the Receiver to make payment to H&K in the
26 amount of \$133,591.61; and
27
28

3. Directing such other and further relief as the Court deems appropriate.

Dated: August 2, 2021

Respectfully submitted,

HOLLAND & KNIGHT LLP

/s/ Kristina S. Azlin

Jose A. Casal (*pro hac vice*)
Kristina S. Azlin (SBN 235238)
Samuel J. Stone (SBN 317013)

*Attorneys for Josias Dewey, Court-appointed
Receiver for Receivership Entities*

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*Attorneys for Josias Dewey, Court-appointed
Receiver for Receivership Entities*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

TITANIUM BLOCKCHAIN
INFRASTRUCTURE SERVICES,
INC.; EHI INTERNETWORK AND
SYSTEMS MANAGEMENT, INC.
aka EHI-INSM, INC.; and MICHAEL
ALAN STOLLERY aka MICHAEL
STOLLAIRE,

Defendants.

Case No. 18-4315 DSF (JPRx)

**CERTIFICATION OF COUNSEL IN
SUPPORT OF SECOND INTERIM
FEE APPLICATION OF HOLLAND
& KNIGHT LLP, AS COUNSEL TO
RECEIVER, FOR ALLOWANCE OF
COMPENSATION AND
REIMBURSEMENT OF EXPENSES**

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CERTIFICATION IN SUPPORT OF SECOND INTERIM FEE APPLICATION
OF HOLLAND & KNIGHT LLP, AS COUNSEL TO RECEIVER, FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES

I, Jose A. Casal, counsel to the Receiver in the above-captioned matter and in connection with the Second Interim Fee Application of Holland & Knight LLP therein, do hereby certify as follows:

1. I have reviewed the Second Interim Fee Application of Holland & Knight LLP, including all Exhibits thereto (the “Application”);

2. To the best of my knowledge, information and belief formed after reasonable inquiry, the Application and all fees and expenses in it are true and accurate and comply with the SEC Billing Instructions;

3. All fees contained in the Application are reasonable, necessary and commensurate with the skill and experience required for the activity performed;

4. The amount for which reimbursement is sought in the Application does not include the amortization of the cost of any investment, equipment, or capital outlay; and

5. The requests for reimbursement of services that were justifiably purchased or contracted for from third parties (such as copying, imaging, bulk mail, messenger service, overnight courier, computerized research, or title and lien searches) include only the amount billed to Holland & Knight LLP by the third-party vendor and paid by Holland & Knight LLP to such vendor.

Dated: August 2, 2021

/s/ Jose A. Casal

Jose A. Casal (*pro hac vice*)
Kristina S. Azlin (SBN 235238)
Holland & Knight LLP
Counsel for Josias N. Dewey, Court-appointed
permanent receiver for Defendant Titanium
Blockchain Infrastructure Services, Inc.

*Attorneys for Josias Dewey, Court-appointed
Receiver for Receivership Entities*

#79603632_v12

EXHIBIT A
STANDARDIZED FUND ACCOUNTING REPORT

Receivership in SEC v. Titanium Blockchain Infrastructure Services, Inc., et al.
Civil Court Docket No. 18-4315 DSF (JPRx)

Reporting Period - 01/01/2019 to 06/30/2021

Fund Accounting:		Reporting Period	Subtotal Prior Periods	Grand Total
Line 1	Beginning Balance (as of 12/31/2018)	\$115,566.70		
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income	\$0.00	\$0.00	\$0.00
Line 3	Cash and Securities	\$0.00	\$0.00	\$0.00
Line 4	Interest/Dividends Income	\$0.00	\$0.00	\$0.00
Line 5	Business Asset Liquidation	\$45,190.13	\$0.00	\$45,190.13
Line 6	Personal Asset Liquidation	\$0.00	\$0.00	\$0.00
Line 7	Third-Party Litigation Income	\$0.00	\$0.00	\$0.00
Line 8	Miscellaneous - Other	\$0.00	\$0.00	\$0.00
Line 8a	Total Funds Available (Lines 1-8)	\$160,756.83	\$0.00	\$160,756.83
	<i>Decreases in Fund Balance:</i>			
Line 9	Disbursements to Investors	\$0.00	\$0.00	\$0.00
Line 10	Disbursements for Receivership Operations	\$0.00	\$0.00	\$0.00
Line 10a	Disbursements to Receiver or Other Professionals	\$119,279.74	\$0.00	\$119,279.74
Line 10b	Business Asset Expenses	\$20,296.49	\$195,225.13	\$215,521.62
Line 10c	Personal Asset Expenses	\$0.00	\$0.00	\$0.00
Line 10d	Investment Expenses	\$0.00	\$0.00	\$0.00
Line 10e	Third-Party Litigation Expenses			
	1. Attorneys Fees	\$0.00	\$0.00	\$0.00
	2. Litigation Expenses	\$0.00	\$0.00	\$0.00
	Total Third-Party Litigation Expenses	\$0.00	\$0.00	\$0.00
Line 10f	Tax Administrator Fees and Bonds	\$0.00	\$0.00	\$0.00
Line 10g	Federal and State Tax Payments	\$0.00	\$0.00	\$0.00
	Total Disbursements for Receivership Operations	\$139,576.23	\$195,225.13	\$334,801.36
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	Distribution Plan Development Expenses:			
	1. Fees	\$0.00	\$0.00	\$0.00
	Fund Administration	\$0.00	\$0.00	\$0.00
	Independent Distribution Consultant (IDC)	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Miscellaneous	\$0.00	\$0.00	\$0.00
	Total Plan Development Expenses	\$0.00	\$0.00	\$0.00
Line 11b	Distribution Plan Implementation Expenses			
	1. Fees	\$0.00	\$0.00	\$0.00
	Fund Administration	\$0.00	\$0.00	\$0.00
	Independent Distribution Consultant (IDC)	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Investor Identification	\$0.00	\$0.00	\$0.00
	Notice/Publishing Approved Plan	\$0.00	\$0.00	\$0.00
	Claimant Identification	\$0.00	\$0.00	\$0.00
	Claims Processing	\$0.00	\$0.00	\$0.00
	4. Fund Administrator Bond	\$0.00	\$0.00	\$0.00
	5. Miscellaneous	\$0.00	\$0.00	\$0.00
	6. Federal Account for Investor Restitution	\$0.00	\$0.00	\$0.00
	(FAIR) Reporting Expenses	\$0.00	\$0.00	\$0.00
	Total Plan Implementation Expenses	\$0.00	\$0.00	\$0.00
	Total Disbursements for Distribution Expenses Paid by the Fund	\$0.00	\$0.00	\$0.00
Line 12	Disbursements to Court/Other			
Line 12a	Investment Expenses/Court Registry Investment System (CRIS) Fees	\$0.00	\$0.00	\$0.00
Line 12b	Federal Tax Payments	\$0.00	\$0.00	\$0.00
	Total Disbursements to Court/Other:	\$0.00	\$0.00	\$0.00
	Total Funds Disbursed (Line 9-11):	\$139,576.23	\$195,225.13	\$334,801.36
Line 13	Ending Balance (As of 06/30/2021):	\$21,180.60		

Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents	\$0.00	\$0.00	\$0.00
Line 14b	Investments	\$0.00	\$0.00	\$0.00
Line 14c	Other Assets or Uncleared Funds (Frozen Accounts)	See Note 1	See Note 1	See Note 1
	Total Ending Balance of Fund - Net Assets	\$0.00	\$0.00	\$0.00
Other Supplemental Information:		Reporting Period	Subtotal Prior Periods	Grand Total
Report of Items NOT To Be Paid by the Fund:				
Line 15	Disbursements for Plan Administration Expenses Not Paid by the Fund:			
Line 15a	Plan Development Expenses Not Paid by the Fund:			
	1. Fees	\$0.00	\$0.00	\$0.00
	Fund Administrator	\$0.00	\$0.00	\$0.00
	IDC	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Miscellaneous	\$0.00	\$0.00	\$0.00
	Total Plan Development Expenses Not Paid by the Fund	\$0.00	\$0.00	\$0.00
Line 15b	Plan Implementation Expenses Not Paid by the Fund:			
	1. Fees	\$0.00	\$0.00	\$0.00
	Fund Administrator	\$0.00	\$0.00	\$0.00
	IDC	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Investor Identification:	\$0.00	\$0.00	\$0.00
	Notice/Publishing Approved Plan	\$0.00	\$0.00	\$0.00
	Claimant Identification	\$0.00	\$0.00	\$0.00
	Claims Processing	\$0.00	\$0.00	\$0.00
	Web Site Maintenance/Call Center	\$0.00	\$0.00	\$0.00
	4. Fund Administrator Bond	\$0.00	\$0.00	\$0.00
	5. Miscellaneous	\$0.00	\$0.00	\$0.00
	6. FAIR Reporting Expenses	\$0.00	\$0.00	\$0.00
	Total Plan Implementation Expenses Not Paid by the Fund	\$0.00	\$0.00	\$0.00
Line 15c	Tax Administrator Fees & Bonds Not Paid by the Fund	\$0.00	\$0.00	\$0.00
	Total Disbursements for Plan Administration Expenses Not Paid by the Fund	\$0.00	\$0.00	\$0.00
Line 16	Disbursements to Court/Other Not Paid by the Fund	\$0.00	\$0.00	\$0.00
Line 16a	Investment Expenses/CRIS Fees	\$0.00	\$0.00	\$0.00
Line 16b	Federal Tax Payments	\$0.00	\$0.00	\$0.00
	Total Disbursements to Court/Other Not Paid by the Fund:	\$0.00	\$0.00	\$0.00
Line 17	DC & State Tax Payments	\$0.00	\$0.00	\$0.00
Line 18	No. of Claims:			
Line 18a	# of Claims Received This Reporting Period	217	193	410
Line 18b	# of Claims Received Since Inception of Fund	410	193	410
Line 19	No. of Claimants/Investors			
Line 19a	# of Claimants/Investors Paid This Reporting Period	0	0	0
Line 19b	# of Claimants/Investors Paid Since Inception of Fund	0	0	0

Notes:

1)	The receivership holds the following non-cash business assets:	Amount of Units (if applicable)	Unit Value (as of 6/30/2021)**	Aggregate Value (as of 6/30/2021)
	Bitcoin (BTC)	113.471	\$34,197.55	\$3,880,430.20
	Bitcoin SV	1.55416	\$142.42	\$221.34
	Ether (ETH)	2151.37	\$2,149.87	\$4,625,165.82
	Zcash (ZEC)	7.9046	\$124.39	\$983.25
	Litecoin (LTC)	4358.11	\$139.29	\$607,041.14
	Bitcoin Cash (BTH)	0.0004694		
	OMG (OMG)	51.56000141		
	Computer equipment, televisions, phones			\$2,000.00 (est)
		Total		\$9,115,841.75

*The total approximate value of the cryptocurrencies listed above, as of the date of this filing, is \$9,113,841.76. There is significant market volatility in the prices of most of these cryptocurrencies.

**sourced from <https://coinmarketcap.com/>

EXHIBIT B

SUMMARY OF FEES BY PROFESSIONAL

Name	Title	H&K Office Location	Hourly Billing Rate¹	Total Hours	Total Fees
Kristina S. Azlin	Partner	Los Angeles	\$720.00	10.4	\$7,488.00
Jose A. Casal	Partner	Miami	\$850.00	22.6	\$19,210.00
Jose A. Casal	Partner	Miami	\$890.00	9.6	\$8,544.00
Kevin E. Packman	Partner	Miami	\$850.00	0.3	\$255.00
Kevin E. Packman	Partner	Miami	\$925.00	1.0	\$925.00
Shawn S. Amuial	Associate	Miami	\$450.00	72.9	\$32,805.00
Shawn S. Amuial	Associate	Miami	\$475.00	84.7	\$40,232.50
Shawn S. Amuial	Associate	Miami	\$555.00	12.7	\$7,048.50
Trisha M. Thompson	Associate	Portland	\$325.00	16.2	\$5,265.00
Trisha M. Thompson	Associate	Portland	\$350.00	2.1	\$735.00
Trisha M. Thompson	Associate	Portland	\$375.00	0.7	\$262.50
Trisha M. Thompson	Associate	Portland	\$162.50 (Travel Rate)	4.5	\$731.25
Delia M. Hayes	Paralegal	Miami	\$275.00	3.6	\$990.00
Delia M. Hayes	Paralegal	Miami	\$285.00	0.5	\$142.50
Sharon O'Dowd	Paralegal	Miami	\$275.00	6.9	\$1,897.50
Charles J. Pentis	Paralegal	Boston	\$430.00	1.4	\$602.00
Shannan Whalen	Paralegal	Boston	\$300.00	0.2	\$60.00
Jacqueline Norton	Research Manager	Miami	\$225.00	0.3	\$67.50
Anh Huynh	Litigation & eDiscovery Services Analyst	Atlanta	\$215.00	3.0	\$645.00
Adriano M. Ferreira	Litigation & eDiscovery Services Operations Manager	New York	\$215.00	9.0	\$1,935.00
Subtotal:				262.6	\$129,841.25

¹ Before application of 10% discount.

Name	Title	H&K Office Location	Hourly Billing Rate ¹	Total Hours	Total Fees
<i>(Less 10% Discount)</i>					<i>(\$12,984.13)</i>
TOTAL:				262.6	\$116,857.12

Overall Total: **\$116,857.12**

Attorney Fees: \$123,501.75

Total Attorney Hours: 237.7

Attorneys' Blended Rate: \$519.57

EXHIBIT C

SUMMARY OF FEES BY TASK CATEGORY

Task Code	Description	Total Hours	Total Fees
B110	Case Administration	44.2	\$21,930.50
B120	Asset Analysis and Recovery	77.9	\$38,524.00
B130	Asset Disposition	49.1	\$22,589.00
B150	Creditor Communications	4.0	\$1,790.00
B160	Fee/Employment Applications	0	0
B190	Other Contested Matters	15.7	\$12,211.00
B195	Travel Time	4.5	\$731.25
B210	Business Operations	22.1	\$10,335.00
B220	Employee Issues	13.8	\$6,238.00
B240	Tax Issues	26.1	\$12,888.50
B310	Claims Administration	5.2	\$2,604.00
	Subtotal:	262.6	\$129,841.25
	<i>(Less 10% Discount)</i>		<i>(\$12,984.13)</i>
	TOTAL:	262.6	\$116,857.12

EXHIBIT D

DAILY TIME RECORDS

Holland & Knight

P.O. Box 936937 | Atlanta, GA 31193-6937
Email account.services@hklaw.com | T 813.901.4180
Holland & Knight LLP | www.hklaw.com | EIN 59-0663819

Josias N. Dewey as Receiver
701 Brickell Avenue, Suite 3300
Miami, FL 33131

July 21, 2021
Invoice: 6218903

TERMS: DUE ON RECEIPT

REMITTANCE COPY

Our Matter: 159447.00001
SEC v. Titanium Blockchain Infrastructure Services, Inc., et al.

FEES FOR PROFESSIONAL SERVICES:	\$	129,841.25
LESS COURTESY DISCOUNT:	\$	<u>-12,984.13</u>
PROFESSIONAL FEES:	\$	116,857.12
REIMBURSABLE COSTS:	\$	6,564.49

TOTAL DUE THIS INVOICE:	\$	<u>123,421.61</u>
--------------------------------	----	--------------------------

Holland & Knight kindly thanks you for your business and prompt payment.

Holland & Knight

P.O. Box 936937 | Atlanta, GA 31193-6937
Email account.services@hklaw.com | T 813.901.4180
Holland & Knight LLP | www.hklaw.com | EIN 59-0663819

To expedite processing of your payment, please include the matter number(s) or invoice number(s) with your payment.

Wire:

Wells Fargo Bank N.A.
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Josias N. Dewey as Receiver
701 Brickell Avenue, Suite 3300
Miami, FL 33131

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TERMS: DUE ON RECEIPT

For professional services rendered through December 31, 2019 in connection with the following:

Our Matter: 159447.00001
SEC v. Titanium Blockchain Infrastructure Services, Inc., et al.

TASK/ACTIVITY

B110 - Case Administration A101 - Plan and Prepare for

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/7/18	Shawn S. Amual	Meet with Andrew Balthazor to discuss tracking Richard Silver's cryptocurrency with coinbase and tracing deposits of Bitcoin and Ether.	1.30	450.00	585.00
11/30/18	Shawn S. Amual	Conversations with Joe Dewey and Wells Fargo re: disbursements for compilation of schedules to be submitted with liquidation motion.	1.10	475.00	522.50
12/12/18	Shawn S. Amual	Calls and discussions re the engagement of GTLLP for accounting services	0.40	475.00	190.00
5/23/19	Delia M. Hayes	Gather pleadings to update Receiver's website.	0.30	275.00	82.50
6/20/19	Shawn S. Amual	Meeting with Joe Dewey to discuss potential verification methods for TBIS investors and compile liquidation plan	0.60	475.00	285.00
Total:	B110 A101	Case Administration Plan and Prepare for	3.70		1,665.00

B110 - Case Administration A102 - Research

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/15/18	Shawn S. Amual	Research forensic accounting firms in South Florida.	0.90	450.00	405.00
12/11/18	Jacqueline Norton	Researched specialized databases to locate cases for D. Hayes.	0.30	225.00	67.50
Total:	B110 A102	Case Administration Research	1.20		472.50

B110 - Case Administration
A103 - Draft/Revise

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/25/18	Jose A. Casal	Review and revise initial status report and exchange memoranda with SEC.	1.30	850.00	1,105.00
6/25/18	Kristina S. Azlin	Edit and finalize Initial Status Report to Court regarding Receivership; file same; circulate same.	0.50	720.00	360.00
7/11/18	Shawn S. Amual	Correspond with Dede Hayes in connection with pulling the TBIS docket; work with firm IT to make updates to receivership homepage	0.50	450.00	225.00
12/13/18	Shawn S. Amual	Work on standardized fund accounting report	0.90	475.00	427.50
12/17/18	Shawn S. Amual	Draft disbursement summary for filing	1.50	475.00	712.50
12/18/18	Shawn S. Amual	Finalize funding schedule and circulate for Receiver review.	1.10	475.00	522.50
9/10/19	Shawn S. Amual	Draft and revise motion to partially liquidate assets	1.10	475.00	522.50
10/3/19	Shawn S. Amual	Review motion for liquidation with Receiver and further revise motion	0.50	555.00	277.50
10/4/19	Shawn S. Amual	Revise motion for partial liquidation and correspondences with West Coast litigation team	0.60	555.00	333.00
10/7/19	Shawn S. Amual	Continue to work on revision motion for partial liquidation and correspondences with	0.40	555.00	222.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		SEC and Receiver			
10/8/19	Shawn S. Amual	Discuss general liquidation plans with Receiver	0.20	555.00	111.00
10/10/19	Shawn S. Amual	Continued revisions to motion and correspondences with SEC and Receiver	0.30	555.00	166.50
Total:	B110 A103	Case Administration Draft/Revise	8.90		4,985.00

B110 - Case Administration
A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/25/18	Trisha M. Thompson	Review communications between A. Rhodes and landlord in preparation for upcoming trip to Springfield.	0.10	325.00	32.50
6/26/18	Shawn S. Amual	Read final receiver's' initial status report	0.40	450.00	180.00
7/3/18	Shawn S. Amual	Work with Joe Dewey and firm IT to update and fix receivership notice website.	0.50	450.00	225.00
9/26/18	Shawn S. Amual	Review RFP by accounting firm for proposed forensic accounting services.	0.30	450.00	135.00
12/10/18	Shawn S. Amual	Review proposed engagement letter from Howard Grobstein and correspond with him re the proposed scope and pricing of his accounting services	0.70	475.00	332.50
12/11/18	Delia M. Hayes	Review status of SEC v. Titanium case; telephone conference with Counsel J. Casal concerning pending court deadlines; prepare email to Research department requesting case tracking on same.	0.30	275.00	82.50
1/2/19	Kristina S. Azlin	Review status of case, current case schedule, and outstanding issues (.3); follow-up with J. Casal regarding same in order to schedule planning call (.1).	0.40	720.00	288.00
1/22/19	Jose A. Casal	Review and confer on SEC's proposed motion	0.20	890.00	178.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		for stay.			
1/25/19	Shawn S. Amuial	Review Lexis Nexis docket alert update.	0.10	475.00	47.50
2/4/19	Kristina S. Azlin	Attention to communications among all counsel and SEC filing regarding lifting of stay (.1).	0.10	720.00	72.00
2/12/19	Shawn S. Amuial	Review updates to docket and scheduling changes for case administration	0.30	475.00	142.50
2/14/19	Shawn S. Amuial	Call with Joe Dewey and Jose Casal re call with Holmes and review accountant invoices with Joe Dewey	0.50	475.00	237.50
4/5/19	Shawn S. Amuial	Assist with revisions to Stipulation for Order Modifying Asset Freeze Re: Funds Held By Coinbase.	0.20	475.00	95.00
5/6/19	Shawn S. Amuial	Call and correspondences with internal team re SEC's request and search through records for requested backup	0.50	475.00	237.50
5/10/19	Shawn S. Amuial	Review stipulation drafted by SEC	0.20	475.00	95.00
5/22/19	Shawn S. Amuial	Review consent to judgment circulated by SEC	0.30	475.00	142.50
10/23/19	Shawn S. Amuial	Work with Nicholas Meltzer to review motion for partial liquidation	0.20	555.00	111.00
10/28/19	Shawn S. Amuial	Review draft liquidation and distribution outline provided by Andrew Balthazor	0.30	555.00	166.50
10/31/19	Shawn S. Amuial	Discuss draft liquidation and distribution outline with Andrew Balthazor	0.30	555.00	166.50
11/1/19	Shawn S. Amuial	Work to finalize submission of motion to partially liquidate	0.40	555.00	222.00
11/4/19	Shawn S. Amuial	Discuss draft liquidation and distribution outline with Joe Dewey and Andrew Balthazor	1.00	555.00	555.00
11/6/19	Shawn S.	Discuss engagement of Hong Kong counsel	0.30	555.00	166.50

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	Amual	with Andrew Balthazor and Joe Dewey			
12/2/19	Shawn S. Amual	Review proposal by Hong Kong counsel to file action in Hong Kong	0.30	555.00	166.50
Total:	B110 A104	Case Administration Review/Analyze	7.90		4,077.00

B110 - Case Administration
A105 - Communicate (in firm)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/27/18	Shawn S. Amual	Work to update receivership account.	0.20	450.00	90.00
8/15/18	Jose A. Casal	Confer with Receiver on Telegram access issues.	0.20	850.00	170.00
1/3/19	Shannan E. Whalen	E-mails with team re: matter status, pending tasks, and scheduling of team call.	0.20	300.00	60.00
1/7/19	Shawn S. Amual	All-hands call with team to discuss status of case and next steps	0.70	475.00	332.50
1/20/19	Kristina S. Azlin	Continued attention to SEC's request for a stay of case in light of government shut-down (.2).	0.20	720.00	144.00
2/19/19	Shawn S. Amual	Correspondences with internal team re information on hard drives and discuss with Joe Dewey	0.20	475.00	95.00
5/22/19	Jose A. Casal	Review and confer on effect of judgment, proposed liquidation of assets and plan of distribution.	0.50	890.00	445.00
6/13/19	Trisha M. Thompson	Review mail received from Kroll; Email to H&K legal team re: same.	0.10	350.00	35.00
6/17/19	Trisha M. Thompson	Emails re: TBIS property stored in the Portland office.	0.10	350.00	35.00
11/14/19	Shawn S. Amual	Discussion and correspondences with Andrew Balthazor re Hong Kong counsel and call with Hong Kong counsel	1.00	555.00	555.00
11/26/19	Shawn S.	Further discuss liquidation methodology with	0.70	555.00	388.50

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	Amual	Receiver and commence liquidation per Court's order			
Total:	B110 A105	Case Administration Communicate (in firm)	4.10		2,350.00

B110 - Case Administration

A107 - Communicate (other outside counsel)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/27/18	Jose A. Casal	Telephone conference with counsel for M. Stollaire.	0.20	850.00	170.00
7/17/18	Jose A. Casal	Conference call with D. Brown and Receiver regarding forensic findings.	0.40	850.00	340.00
7/27/18	Jose A. Casal	Exchange memoranda with M. Stollaire's counsel regarding turnover of items in safe deposit box.	0.20	850.00	170.00
8/7/18	Jose A. Casal	Review and exchange memoranda with A. Tyler (DOJ) and Receiver regarding access to Telegram.	0.40	850.00	340.00
8/13/18	Jose A. Casal	Exchange memoranda with A. Tyler (DOJ).	0.20	850.00	170.00
8/15/18	Jose A. Casal	Telephone conference with A. Tyler (DOJ) regarding telegram inquiry.	0.20	850.00	170.00
8/23/18	Jose A. Casal	Telephone conference with D. Brown regarding status of investigations and prepare memorandum.	0.70	850.00	595.00
6/19/19	Jose A. Casal	Conference call with D. Miller of SEC regarding disgorgement claim.	0.30	890.00	267.00
Total:	B110 A107	Case Administration Communicate (other outside counsel)	2.60		2,222.00

B110 - Case Administration

A108 - Communicate (other external)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/22/18	Jose A. Casal	Conference call with DOJ and FBI regarding	0.40	850.00	340.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Telegram account.			
12/13/18	Shawn S. Amual	Draft and send email to SEC re accounting services	0.20	475.00	95.00
12/14/18	Shawn S. Amual	Correspondence with David Brown with SEC and coordinate call with SEC and H&K	0.20	475.00	95.00
1/7/19	Shawn S. Amual	Correspondence with receivership accountant sending engagement letter and discussing tax election of non-receivership entity	0.20	475.00	95.00
1/18/19	Kristina S. Azlin	Attention to communications from the SEC and draft motion for stay of case in light of government shut-down (.2).	0.20	720.00	144.00
2/1/19	Kristina S. Azlin	Attention to communications from the SEC and draft motion to lift stay (.1)	0.10	720.00	72.00
2/6/19	Trisha M. Thompson	Review communications re: former TBIS employee W2s.	0.10	350.00	35.00
4/1/19	Shawn S. Amual	Review correspondences from Stollaire's attorney re Wyoming virtual assistant and reach out to assistant for additional information	0.10	475.00	47.50
4/5/19	Kristina S. Azlin	Attention to status of Mr. Silver's signature on Coinbase Stipulation; further communications with counsel for the SEC regarding setting a call to discuss case schedule and status of receivership.	0.20	720.00	144.00
4/9/19	Kristina S. Azlin	Participate in call with counsel for the SEC regarding case schedule and status of receivership; update calendar and task list in response to same.	0.50	720.00	360.00
4/9/19	Shawn S. Amual	Prep for call with SEC and call with SEC	1.00	475.00	475.00
4/11/19	Kristina S. Azlin	Continue to follow-up on requests from SEC regarding document collection and recovery issues; further attention to communications regarding Receiver's status report.	0.20	720.00	144.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
4/12/19	Kristina S. Azlin	Continue to follow-up on requests from SEC regarding document collection and recovery issues.	0.20	720.00	144.00
4/14/19	Kristina S. Azlin	Attention to communications with counsel for the SEC regarding document collection and recovery issues.	0.20	720.00	144.00
6/4/19	Shawn S. Amual	Correspondences and voicemail re request from SEC for update on receivership	0.10	475.00	47.50
6/7/19	Shawn S. Amual	Review correspondence from SEC and discuss with Joe Dewey	0.20	475.00	95.00
6/28/19	Shawn S. Amual	Plan for call with research and call with SEC	0.70	475.00	332.50
10/24/19	Shawn S. Amual	Correspondences with SEC re filing of motion for partial liquidation	0.20	555.00	111.00
10/25/19	Shawn S. Amual	Correspondences with SEC and H&K re filing of motion for partial liquidation	0.30	555.00	166.50
12/26/19	Shawn S. Amual	Correspondences in anticipation of call and call with Hong Kong counsel	0.50	555.00	277.50
Total:	B110 A108	Case Administration Communicate (other external)	5.80		3,364.50

B110 - Case Administration
A110 - Manage Data/Files

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/11/18	Sharon K. O'Dowd	Begin review of case pleadings (.4); begin notification of receiver and team re relevant deadlines (1.0).	1.40	275.00	385.00
12/12/18	Sharon K. O'Dowd	Review and analyze jury trial order re deadlines and filing requirements; review judge's website for preferred document samples (1.0).	1.00	275.00	275.00
12/14/18	Sharon K. O'Dowd	Further review of case pleadings (.8); further notification of receiver and team re individual deadlines and reminders (2.5).	3.30	275.00	907.50

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/21/18	Sharon K. O'Dowd	Additional review of case pleadings (.6); notification of receiver and team re individual deadlines and reminders (.6).	1.20	275.00	330.00
2/12/19	Delia M. Hayes	Review Court's order and calendar events based on new scheduling order.	0.90	275.00	247.50
4/9/19	Delia M. Hayes	Prepare files for Receiver website update.	0.20	275.00	55.00
5/15/19	Delia M. Hayes	Upload files and prepare for Receiver's website.	0.80	275.00	220.00
5/16/19	Delia M. Hayes	Assist counsel in downloading current Court pleadings and prepare for website.	1.10	275.00	302.50
Total:	B110 A110	Case Administration Manage Data/Files	9.90		2,722.50

B110 - Case Administration
A111 - Other

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/24/19	Kristina S. Azlin	Attention to order from Court granting SEC's request for a stay of case in light of government shut-down (.1).	0.10	720.00	72.00
Total:	B110 A111	Case Administration Other	0.10		72.00

B120 - Asset Analysis and Recovery
A101 - Plan and Prepare for

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/27/18	Trisha M. Thompson	Prepare for trip to TBIS Springfield office to remove property from leased premises.	0.50	325.00	162.50
8/20/18	Shawn S. Amual	Meeting with Joe Dewey to discuss next steps with respect to tracing cryptocurrency through cryptocurrency exchanges.	0.30	450.00	135.00
2/21/19	Anh Huynh	Analyzing Mac file system collection folder for personal files since data contains both	3.00	215.00	645.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		allocated and unallocated memory.			
Total:	B120 A101	Asset Analysis and Recovery Plan and Prepare for	3.80		942.50

B120 - Asset Analysis and Recovery
A102 - Research

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/5/18	Shawn S. Amual	Finalize review of Andrew Balthazor's analysis of BFP laws as they pertain to crypto theft	0.50	475.00	237.50
Total:	B120 A102	Asset Analysis and Recovery Research	0.50		237.50

B120 - Asset Analysis and Recovery
A103 - Draft/Revise

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/16/18	Jose A. Casal	Revise and finalize follow up inquiries to HitBTC.	0.30	850.00	255.00
7/16/18	Jose A. Casal	Revise and finalize demand letter to Changelly.com.	0.30	850.00	255.00
7/22/18	Shawn S. Amual	Draft re response letter to HitBTC; send to Jose Casal and Joe Dewey for review.	0.90	450.00	405.00
7/25/18	Shawn S. Amual	Correspondences with Joe Dewey, Josh Strickon and Andrew Balthazor re potential strategies for further asset recovery analysis via analysis of crypto transfers.	0.80	450.00	360.00
8/1/18	Shawn S. Amual	Revise draft stipulation requesting funds from Coinbase (.8); review spreadsheets provided by Receiver to identify the relevant accounts (1.0).	1.80	450.00	810.00
8/6/18	Jose A. Casal	Review and revise proposed stipulation with R. Silver.	0.60	850.00	510.00
3/5/19	Jose A. Casal	Review and edit updated Coinbase stipulation.	0.30	890.00	267.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/21/19	Shawn S. Amual	Several calls with Bank and draft two letters to Bank requesting records requested by Receiver	1.80	475.00	855.00
7/2/19	Shawn S. Amual	Research status with wallets hosted on HitBTC that had control/possession of stolen crypto and draft letter to HitBTC asking for transfer of crypto to receivership.	1.50	475.00	712.50
8/19/19	Shawn S. Amual	Revise letter requesting possession of cryptocurrency	0.50	475.00	237.50
8/20/19	Shawn S. Amual	Modify letter to counsel re transfer of digital assets	0.20	475.00	95.00
10/7/19	Shawn S. Amual	Work with Portland office on disposition of personal property	0.30	555.00	166.50
Total:	B120 A103	Asset Analysis and Recovery Draft/Revise	9.30		4,928.50

B120 - Asset Analysis and Recovery
A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/26/18	Shawn S. Amual	Continue reviewing analysis re stolen Ether	0.50	450.00	225.00
6/27/18	Shawn S. Amual	Correspondences with Joe Dewey and Andrew Balthazor regarding recovery of stolen Ether.	0.50	450.00	225.00
7/5/18	Trisha M. Thompson	Review inventory of items collected from TBIS Springfield on June 28, 2018.	0.30	325.00	97.50
7/5/18	Shawn S. Amual	Review contents of "Becky's box" to attain and analyze any company-owned assets/documents.	0.50	450.00	225.00
7/9/18	Shawn S. Amual	Continue to review contents of box shipped from Portland office; consolidate Becky's Mile's property for FedEx.	0.80	450.00	360.00
7/10/18	Shawn S. Amual	Work with Joe Dewey and Melody Grafals to consolidate financial information into a	0.80	450.00	360.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		consolidated spreadsheet.			
7/12/18	Jose A. Casal	Review and analyze response from HitBTC and exchange memoranda with Receiver and SEC.	1.50	850.00	1,275.00
7/16/18	Shawn S. Amual	Discussions with Andrew Balthazor and Joe Dewey regarding progress re findings of trail of cryptocurrency through several exchanges; document processes used to attain such findings; work with Andrew and Josh Strickon to refine data collection software in efforts to more precisely analyze patterns between given wallets through which the stolen cryptocurrency was transferred	1.00	450.00	450.00
7/17/18	Shawn S. Amual	Review analysis of trail of stolen cryptocurrency and discuss findings with receiver.	1.10	450.00	495.00
7/18/18	Shawn S. Amual	Discussions with Andrew Balthazor and Joe Dewey regarding progress re findings of trail of cryptocurrency through several exchanges; document processes used to attain such findings; work with Andrew and Josh Strickon to refine data collection software in efforts to more precisely analyze patterns between given wallets through which the stolen cryptocurrency was transferred.	0.90	450.00	405.00
7/19/18	Shawn S. Amual	Correspondences with Andrew Balthazor re findings of trail of cryptocurrency through several exchanges; document processes used to attain such findings.	0.40	450.00	180.00
7/20/18	Jose A. Casal	Review and confer on further response from HitBTC.	0.30	850.00	255.00
7/23/18	Jose A. Casal	Review proposed response to HitBTC.	0.30	850.00	255.00
7/27/18	Shawn S. Amual	Receipt of hard drive from Kroll with image of laptop content; review content; discuss with Joe Dewey.	0.90	450.00	405.00
7/31/18	Jose A. Casal	Review HitBTC correspondence to UK cyber	0.20	850.00	170.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		crimes police unit and exchange memoranda.			
8/8/18	Shawn S. Amual	Review content of hard drive provided from Kroll with images of Silver, Stollaire and Hadi's hard drives.	2.10	450.00	945.00
8/10/18	Shawn S. Amual	Review ICO rating report compiled for TBIS by CryptoCentral; analyze facts described against company-related content.	0.40	450.00	180.00
9/6/18	Shawn S. Amual	Review Coinbase account spreadsheets to determine details of Richard Silver's account per requested information from Stollaire's attorney.	0.40	450.00	180.00
9/12/18	Shawn S. Amual	Work with Andrew Balthazor to derive which, and how much, cryptocurrency belonged to Richard Silver and not TBIS.	0.40	450.00	180.00
10/18/18	Shawn S. Amual	Review analysis provided by Andrew Balthazor pertaining to third party claims and send response to analysis	0.30	475.00	142.50
10/23/18	Jose A. Casal	Review and analyze response from Changelly.	0.20	890.00	178.00
10/23/18	Shawn S. Amual	Review feedback from Changelly re request for information pertaining to certain public address and discuss analysis with Andrew Balthazor	0.40	475.00	190.00
10/24/18	Shawn S. Amual	Continued correspondences and analysis with Andrew Balthazor re feedback from Changelly and its application to our prior analysis	0.50	475.00	237.50
10/31/18	Shawn S. Amual	Review analysis by Andrew Balthazor re BFP application to crypto theft	0.50	475.00	237.50
11/20/18	Shawn S. Amual	Review updated summary from Andrew Balthazor re implications of sale of crypto to BFP	0.50	475.00	237.50
11/21/18	Shawn S. Amual	Continue review updated summary from Andrew Balthazor re implications of sale of crypto to BFP	0.60	475.00	285.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/27/18	Shawn S. Amual	Discuss and review correspondences with Josh Strickon, Joe Dewey and Andrew Balthazor re BlockBlade and tracing trail of Bitcoin stolen from TBIS	1.00	475.00	475.00
12/10/18	Shawn S. Amual	Correspondence with Staci Dawson re personal property and search through on site storage boxes for requested personal property	0.60	475.00	285.00
1/8/19	Kristina S. Azlin	Continued attention to status of Coinbase stipulation and communications among counsel regarding same (.2).	0.20	720.00	144.00
1/10/19	Kristina S. Azlin	Prepare and transmit email to counsel for of Mr. Stollaire regarding stipulation to access Coinbase assets (.6).	0.60	720.00	432.00
1/15/19	Kristina S. Azlin	Follow-up with counsel for Mr. Stollaire regarding stipulation to access Coinbase assets (.1).	0.10	720.00	72.00
2/21/19	Adriano M. Ferreira	Call with C. Sorley to discuss evidence collected for Michael Stollaire for review.	0.80	215.00	172.00
2/22/19	Adriano M. Ferreira	Review and analyze evidence logs to prepare evidence for Michael Stollaire's review.	3.80	215.00	817.00
2/26/19	Adriano M. Ferreira	Review and analyze evidence logs for Michael Stollaire; Call with A. Valentine of Kroll to discuss RAID Array rebuilding for Michael Stollaire evidence	0.60	215.00	129.00
2/27/19	Adriano M. Ferreira	Work on preparation of evidence for Michael Stollaire's review.	0.50	215.00	107.50
3/2/19	Adriano M. Ferreira	Prepare evidence for Michael Stollaire for review.	1.50	215.00	322.50
3/4/19	Kristina S. Azlin	Update draft of proposed Coinbase stipulation and circulate same to H& team for comment (.4).	0.40	720.00	288.00
3/5/19	Kristina S. Azlin	Distribute updated draft of proposed Coinbase stipulation to all counsel (.2).	0.20	720.00	144.00
3/5/19	Adriano M.	Prepare evidence for Michael Stollaire for	0.50	215.00	107.50

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	Ferreira	review.			
3/6/19	Kristina S. Azlin	Attention to follow-up communications regarding status of Coinbase stipulation.	0.20	720.00	144.00
3/11/19	Kristina S. Azlin	Attention to status of the Coinbase stipulation.	0.20	720.00	144.00
3/14/19	Kristina S. Azlin	Email all counsel regarding agreement to proposed Coinbase stipulation (.4); attention to follow-up communications with counsel concerning same (.3).	0.70	720.00	504.00
3/15/19	Kristina S. Azlin	Continued attention to follow-up communications regarding the Coinbase stipulation (.1).	0.10	720.00	72.00
4/10/19	Jose A. Casal	Review order approving Coinbase stipulation and transmit to R. Silver and Coinbase.	0.50	890.00	445.00
4/11/19	Shawn S. Amuial	Review correspondences from COINBASE re released crypto and discuss with receiver and Jose Casal	0.40	475.00	190.00
6/18/19	Shawn S. Amuial	Review/analyze progress by internal team on research for potential liquidation and disposition	0.50	475.00	237.50
7/8/19	Shawn S. Amuial	Review content of SD Card chip and USB stick sent from Portland and discuss with Receiver	0.70	475.00	332.50
7/9/19	Shawn S. Amuial	Review correspondences and precedent sent from SEC in connection with liquidation and distribution plans	0.80	475.00	380.00
7/10/19	Shawn S. Amuial	Review correspondences from JP Morgan chase, call bank to discuss requested documents, and coordinate with bank representative	0.60	475.00	285.00
7/17/19	Shawn S. Amuial	Review produced documents from JP Morgan Chase Bank	0.70	475.00	332.50
8/22/19	Shawn S. Amuial	Review HitBTC transparency policy re requirements for requesting transfer of frozen	0.30	475.00	142.50

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		assets			
9/24/19	Shawn S. Amuial	Review proposed draft plans and analysis for liquidation and distribution presented by Andrew	0.60	475.00	285.00
Total:	B120 A104	Asset Analysis and Recovery Review/Analyze	33.40		15,365.00

B120 - Asset Analysis and Recovery
A105 - Communicate (in firm)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/2/18	Trisha M. Thompson	Communications with S. Amuial re: TBIS Springfield property.	0.10	325.00	32.50
7/12/18	Shawn S. Amuial	Discussions with Andrew Balthazor and Joe Dewey regarding memo from HitBTC and potential paths it leads to in terms of suspect wallets.	1.10	450.00	495.00
7/26/18	Shawn S. Amuial	Meeting with Andrew Balthazor to discuss his work research; review summary memo.	0.40	450.00	180.00
9/6/18	Jose A. Casal	Review response from Stollaire's counsel regarding Coinbase stipulation and exchange memoranda on account information.	0.30	850.00	255.00
10/4/18	Shawn S. Amuial	Meeting with Joe Dewey to discuss standing to pursue a case against token "ratings companies"	0.40	475.00	190.00
10/8/18	Shawn S. Amuial	Meeting with Joe Dewey to discuss status of next steps for asset analysis and recovery	0.30	475.00	142.50
10/12/18	Shawn S. Amuial	Discuss and coordinate call with Cryptopia with Joe Dewey	0.20	475.00	95.00
12/11/18	Shawn S. Amuial	Coordinate signature for engagement of Howard Groberstein	0.20	475.00	95.00
1/7/19	Kristina S. Azlin	Participate in team call in order to review outstanding items and strategize regarding next steps (.4); attention to status of Coinbase stipulation and status of communications	0.70	720.00	504.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		among counsel regarding same (.3).			
2/20/19	Shawn S. Amuial	Coordinte and correpond with internal IT and doc review team re recovery of information on hard drives provided by Kroll	0.60	475.00	285.00
2/22/19	Shawn S. Amuial	Several calls and correspondences with IT team in connection with information contained on hard drives in connection with trying to retrieve such information	1.20	475.00	570.00
2/22/19	Adriano M. Ferreira	Call with C. Sorley, A. Chen, J. Washburn, to discuss forensic collection of Michael Stollaire evidence and strategy for searching of relevant data (0.4); Call with C. Sorley and S. Strnad to dicuss forensic collection Michael Stollaire evidence (0.3); Call with C. Sorley and S. Amuial to discuss evidence and strategy for searching of relevant data for review (0.2)	0.90	215.00	193.50
2/25/19	Shawn S. Amuial	Call with receiver and internal e-discovery team to discuss issues surrounding hard drives recovered and provided by Kroll	0.60	475.00	285.00
2/25/19	Adriano M. Ferreira	Teleconference with J. Washburn, J. Dewey and S. Amuial to discuss evidence for review for Michael Stollaire	0.40	215.00	86.00
3/5/19	Shawn S. Amuial	Coordinate with receiver re: issues surrounding employee W-2s.	0.30	475.00	142.50
3/18/19	Kristina S. Azlin	Follow up re: status of Coinbase stipulation.	0.10	720.00	72.00
3/21/19	Jose A. Casal	Review and comment on UK ether theft investigations.	0.20	890.00	178.00
3/22/19	Jose A. Casal	Exchange memoranda on European investigators of Ether theft.	0.20	890.00	178.00
6/17/19	Shawn S. Amuial	Correspondences with Portland office re property sent to them from Kroll as well as the disposition of personal property	0.10	475.00	47.50
8/20/19	Shawn S.	Call with Jose Casal and Joe Dewey to discuss	0.80	475.00	380.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	Amual	assets held by HitBTC and send follow up request to HitBTC asking for release of frozen assets			
9/10/19	Jose A. Casal	Review strategies on recovery of Hit BTC account.	0.30	890.00	267.00
11/8/19	Shawn S. Amual	Call to discuss engagement of Hong Kong counsel for asset recovery	0.30	555.00	166.50
11/11/19	Shawn S. Amual	Discussion and correspondences with Andrew Balthazor re engagement of Hong Kong counsel for asset recovery	0.30	555.00	166.50
12/30/19	Shawn S. Amual	Correspondences and discussions with internal team re claim date cutoffs based on SEC's complaint as well as discussion regarding pre and post receivership owed employment taxes	1.20	555.00	666.00
Total:	B120 A105	Asset Analysis and Recovery Communicate (in firm)	11.20		5,672.50

B120 - Asset Analysis and Recovery

A106 - Communicate (with client)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/23/18	Jose A. Casal	Exchange memoranda with receiver and D. Brown (SEC) regarding US Bank status.	0.20	850.00	170.00
Total:	B120 A106	Asset Analysis and Recovery Communicate (with client)	0.20		170.00

B120 - Asset Analysis and Recovery

A107 - Communicate (other outside counsel)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/25/18	Jose A. Casal	Review response from HitBTC and confer on additional steps.	0.30	850.00	255.00
6/27/18	Jose A. Casal	Exchange memoranda with D. Brown (SEC) regarding HitBTC.	0.20	850.00	170.00
7/20/18	Jose A. Casal	Review and exchange memoranda with D.	0.60	850.00	510.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Brown regarding Coinbase and R. Silver account.			
7/20/18	Jose A. Casal	Telephone conference with Coinbase regarding R. Silver account.	0.30	850.00	255.00
7/27/18	Jose A. Casal	Exchange memoranda with Coinbase on release of accounts.	0.40	850.00	340.00
7/27/18	Jose A. Casal	Exchange memoranda on proposed stipulation with R. Silver regarding Coinbase accounts.	0.30	850.00	255.00
7/30/18	Jose A. Casal	Telephone conference with D. Brown (SEC) regarding status of HitBTC disclosures and other investigations.	0.30	850.00	255.00
8/16/18	Jose A. Casal	Telephone conference with D. Brown (SEC) regarding status of investigation.	0.30	850.00	255.00
9/15/18	Jose A. Casal	Exchange memoranda with M. Stollaire's counsel regarding contents of Coinbase account and status of proposed stipulation.	0.30	850.00	255.00
9/25/18	Jose A. Casal	Telephone conference with D. Brown (SEC) regarding status of stipulation.	0.30	850.00	255.00
5/6/19	Jose A. Casal	Telephone conference with SEC counsel regarding potential disgorgement and settlement issues with M. Stollaire.	0.30	890.00	267.00
Total:	B120 A107	Asset Analysis and Recovery Communicate (other outside counsel)	3.60		3,072.00

B120 - Asset Analysis and Recovery
A108 - Communicate (other external)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/24/18	Shawn S. Amual	Correspondences with Elena from H&K LA office on items to pick up on Monday; correspondences with Mary from Chase Base on Ventura	0.50	450.00	225.00
6/26/18	Jose A. Casal	Conference call with US Bank regarding ACH transactions and account activity prior to receivership.	0.40	850.00	340.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/27/18	Jose A. Casal	Prepare response to HitBTC regarding authority to act on behalf of receiver.	0.30	850.00	255.00
7/5/18	Shawn S. Amuial	Call and correspondences with Wells Fargo re outgoing wires.	0.80	450.00	360.00
7/11/18	Shawn S. Amuial	Call with Joe Dewey and Secret Service to discuss pertinent updates in case; review prior research on trail of stolen crypto to see what has been run through Binance exchange; discuss with Joe	0.80	450.00	360.00
8/1/18	Jose A. Casal	Exchange memoranda with Coinbase.	0.30	850.00	255.00
8/6/18	Jose A. Casal	Review memorandum from Coinbase and exchange with Receiver.	0.20	850.00	170.00
8/7/18	Shawn S. Amuial	Correspondences with Coinbase to set up new Coinbase account for receivership in anticipation of motion being granted to transfer cryptocurrency from Richard Silver's account to receivership's account.	0.70	450.00	315.00
10/10/18	Shawn S. Amuial	Review and reply to correspondences with Cryptopia	0.30	475.00	142.50
10/22/18	Shawn S. Amuial	Correspondence to Matt Dol with Cryptopia	0.10	475.00	47.50
12/3/18	Shawn S. Amuial	Correspondences with Wells Fargo to attain updated schedule of disbursements	0.20	475.00	95.00
12/18/18	Shawn S. Amuial	Internal and external communications with SEC re referral of expert for crypto cases	0.40	475.00	190.00
1/22/19	Shawn S. Amuial	Several communications with Andrew Valentine at Kroll and Trisha Thompson re electronics in possession in Portland to confirm whether certain items have been imaged and tracked	0.50	475.00	237.50
1/23/19	Shawn S. Amuial	Correspondences to Cryptopia	0.20	475.00	95.00
3/5/19	Jose A. Casal	Exchange memoranda with R. Silver regarding Coinbase stipulation and payroll	0.80	890.00	712.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		records.			
3/6/19	Shawn S. Amual	Calls to Intuit, Inc. to discuss TBIS's records with company and reach out to internal client contact to establish contact with company	0.90	475.00	427.50
3/15/19	Jose A. Casal	Exchange memoranda with R. Silver on status of Coinbase stipulation.	0.20	890.00	178.00
3/18/19	Shawn S. Amual	Call with Dena Singer, CPA, and call with Quickbooks to recover payroll information from Dena's wholesale Quickbooks account	0.60	475.00	285.00
3/21/19	Shawn S. Amual	Correspondence with internal team and to FBI attache in London re status of investigation against suspected Ether thief	0.60	475.00	285.00
4/5/19	Jose A. Casal	Follow up communications with R. Silver on Coinbase stipulation.	0.20	890.00	178.00
4/9/19	Jose A. Casal	Prepare and exchange memoranda with R. Silver and Coinbase regarding filing and status of stipulation.	0.30	890.00	267.00
4/10/19	Jose A. Casal	Telephone conference with Coinbase on transfer of assets to Receiver.	0.20	890.00	178.00
4/11/19	Jose A. Casal	Telephone conference with Coinbase regarding transfer of remaining cryptocurrency assets from Silver account.	0.20	890.00	178.00
6/14/19	Shawn S. Amual	Obtain contact info for legal department at bank to retrieve requested information and reach out to bank	0.30	475.00	142.50
12/19/19	Shawn S. Amual	Review correspondences from HitBTC re frozen assets and discuss response request for a call as well as potential suit filed for recovery of assets	0.40	555.00	222.00
Total:	B120 A108	Asset Analysis and Recovery Communicate (other external)	10.40		6,140.50

B120 - Asset Analysis and Recovery
A109 - Appear for/Attend

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/28/18	Trisha M. Thompson	Attend to return of approved personal property to former TBIS Springfield employees and subsequent delivery of unreturned property to H&K Portland office.	4.50	325.00	1,462.50
Total:	B120 A109	Asset Analysis and Recovery Appear for/Attend	4.50		1,462.50

B120 - Asset Analysis and Recovery
A111 - Other

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/11/18	Trisha M. Thompson	Review and catalog items received from Kroll; Communications with receiver re: return to B. Miles & R. Silver.	0.20	325.00	65.00
8/8/18	Shawn S. Amual	Correspondences and call with Jose Casal re motion to compel Silver to transfer assets from Coinbase.	0.40	450.00	180.00
4/8/19	Kristina S. Azlin	Finalize and file Coinbase Stipulation and Proposed Order; further attention to communications with counsel for the SEC regarding call to discuss case schedule and status of receivership.	0.30	720.00	216.00
4/10/19	Kristina S. Azlin	Attention to Court's issuance of final Coinbase Order.	0.10	720.00	72.00
Total:	B120 A111	Asset Analysis and Recovery Other	1.00		533.00

B130 - Asset Disposition
A101 - Plan and Prepare for

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/26/18	Trisha M. Thompson	Attention to disposition of personal items, including research on value of claimed personal items on R. Silver's list, itemization of those which may be released to TBIS Springfield employees, and communications with client re: same.	2.00	325.00	650.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/10/18	Trisha M. Thompson	Research value and ownership of TBIS Springfield items in the Receiver's possession and research potential options for sale of items not disputed.	2.40	325.00	780.00
9/13/18	Shawn S. Amual	Coordinate disposition of laptop back to Michael Stollaire.	0.20	450.00	90.00
9/20/18	Trisha M. Thompson	Draft cover letter re: return of TBIS Springfield items to R. Silver and coordinate mailing.	0.20	325.00	65.00
6/4/19	Shawn S. Amual	Work with Receiver to draft outline for issues needed to be addressed in connection with plan to liquidate and distribute receivership assets.	1.70	475.00	807.50
6/13/19	Shawn S. Amual	Correspondences with Andrew Balthazor re analysis of ethereum smart contract deposits for TBIS ICO	0.30	475.00	142.50
7/2/19	Shawn S. Amual	Work on partial liquidation plan for immediate receivership needs.	0.50	475.00	237.50
9/9/19	Shawn S. Amual	Conference with Receiver and A. Balthazor to discuss strategy for liquidation and distribution plan and liquidation motion.	2.50	475.00	1,187.50
9/10/19	Shawn S. Amual	Meeting with Andrew Balthazor to discuss liquidation and distribution plan and discuss motion to HitBtc	0.50	475.00	237.50
12/13/19	Delia M. Hayes	Assist Counsel in reviewing Court activity; assist counsel in updating website for Receivership.	0.50	285.00	142.50
12/31/19	Shawn S. Amual	Work with receiver throughout the day to liquidate cryptocurrency in connection with approved liquidation motion	1.30	555.00	721.50
Total:	B130 A101	Asset Disposition Plan and Prepare for	12.10		5,061.50

B130 - Asset Disposition
A102 - Research

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/24/19	Shawn S. Amuial	Research potential smart contract mechanisms for asset disposition	0.20	475.00	95.00
8/19/19	Shawn S. Amuial	Research in connection with potential liquidation plans and transfer of assets in Portland	0.90	475.00	427.50
Total:	B130 A102	Asset Disposition Research	1.10		522.50

B130 - Asset Disposition
A103 - Draft/Revise

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/26/18	Shawn S. Amuial	Correspondences with Portland office re termination of Lease	0.40	450.00	180.00
6/28/18	Trisha M. Thompson	Draft lease termination agreement between TBIS and Hyland Business Park.	0.40	325.00	130.00
7/16/18	Shawn S. Amuial	Revise unpaid employee wage analysis and review bank account statements to calculate cash-on-hand after associated payment to employees.	1.50	450.00	675.00
7/18/18	Shawn S. Amuial	Preparation of employee termination packages, including revisions to spreadsheet analysis of unpaid employee wages, calculation of remaining cash-on-hand after payment to employees, drafting employee termination letters for each employee receiving "catch-up" check, and final assembly of packages for each such employee.	3.20	450.00	1,440.00
7/19/18	Shawn S. Amuial	Update unpaid employee wage analysis and begin work on employee termination letters for each employee receiving "catch-up" check in second batch of employee payments.	1.90	450.00	855.00
7/20/18	Shawn S. Amuial	Further work on revisions to unpaid employee wage analysis and finalization and transmission of associated employee termination letters with second batch of catch-	2.10	450.00	945.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		up checks.			
7/23/18	Shawn S. Amual	Further work on revisions to unpaid employee wage analysis and finalization and transmission of associated employee termination letters with second batch of catch-up checks.	2.60	450.00	1,170.00
7/31/18	Shawn S. Amual	Draft stipulation to compel Coinbase to release frozen assets.	0.90	450.00	405.00
9/4/19	Jose A. Casal	Review and revise motion to partially liquidate assets and proposed order.	0.40	890.00	356.00
Total:	B130 A103	Asset Disposition Draft/Revise	13.40		6,156.00

B130 - Asset Disposition
A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/28/18	Jose A. Casal	Review proposed stipulation.	0.20	850.00	170.00
6/29/18	Jose A. Casal	Review investor liability determinations and claim distribution issues.	0.80	850.00	680.00
7/17/18	Trisha M. Thompson	Attend to return of personal property, including coordination of and correspondence re: return of items to R. Silver and B. Miles, work with IT Support to review the items remaining in H&K's possession, and outreach to Receiver regarding the remaining items.	1.90	325.00	617.50
9/20/18	Shawn S. Amual	Review inventory list of items in Portland office and compare against requests by Richard Silver for release of his personal property.	0.30	450.00	135.00
11/20/18	Trisha M. Thompson	Inventory TBIS Springfield remaining items in response to request by S. Amual.	0.70	350.00	245.00
4/15/19	Jose A. Casal	Review order and exchange memoranda on proposed sale of miscellaneous TBIS property.	0.20	890.00	178.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/5/19	Shawn S. Amuial	Review report of traced crypto provided by Andrew Balthazor and analyze the recoverability of such crypto	0.70	475.00	332.50
6/7/19	Shawn S. Amuial	Several discussions in connection with planning/analyzing plans for liquidation and discuss additional research requirements and filings necessary to effectuate liquidation and creditor payments	1.30	475.00	617.50
6/11/19	Shawn S. Amuial	Review and work on plan for asset liquidation and disposition including reviewing research provided by Andrew Balthazor	1.30	475.00	617.50
6/24/19	Shawn S. Amuial	Work with Receiver on review and analysis of research on liquidation/disposition plans.	1.30	475.00	617.50
6/25/19	Shawn S. Amuial	Continue work with Receiver on review and analysis of research on liquidation/disposition plans.	0.20	475.00	95.00
Total:	B130 A104	Asset Disposition Review/Analyze	8.90		4,305.50

B130 - Asset Disposition
A105 - Communicate (in firm)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/3/18	Shawn S. Amuial	Correspondences with Allison Rhodes re lease termination in Oregon.	0.20	450.00	90.00
7/16/18	Trisha M. Thompson	Communications with S. Amuial and Receiver re: TBIS personal items and response to R. Silver demand.	0.10	325.00	32.50
7/16/18	Shawn S. Amuial	Correspondences with Trisha Thompson in Portland regarding requests from Richard Silver and release of personal property; discussions with receiver regarding same.	0.50	450.00	225.00
7/24/18	Trisha M. Thompson	Request permission from receiver to return certain items to TBIS Springfield employees.	0.20	325.00	65.00
8/30/18	Shawn S.	Correspondences with LA office to gather	0.10	450.00	45.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	Amuial	information about any retained property from TBIS Ventura office.			
8/31/18	Shawn S. Amuial	Coordinate return of laptop to Michael Stollaire.	0.30	450.00	135.00
9/21/18	Trisha M. Thompson	Call with S. Amuial re: return of TBIS Springfield items.	0.10	325.00	32.50
10/26/18	Trisha M. Thompson	Emails with attorneys for Receiver re: TBIS Springfield property.	0.10	350.00	35.00
11/13/18	Shawn S. Amuial	Attention to disposition of electronics, including review of data provided by Kroll to analyze if the ownership of electronics can be traced and determine whether any hard drives were imaged, and coordinate with Portland office re: same.	1.20	475.00	570.00
4/5/19	Trisha M. Thompson	Email to S. Amuial and J. Dewey re: TBIS property remaining in Portland office.	0.10	350.00	35.00
4/15/19	Trisha M. Thompson	Emails with S. Amuial re: storage of TBIS property; Confer with S. Heskett re: same.	0.10	350.00	35.00
8/21/19	Trisha M. Thompson	Emails re: TBIS Springfield property held in the Portland office.	0.10	350.00	35.00
8/22/19	Trisha M. Thompson	Internal emails re: TBIS Springfield property in the Portland office.	0.10	350.00	35.00
8/26/19	Jose A. Casal	Conference call on propose motions to liquidate assets and compel turnover of cryptocurrency.	0.30	890.00	267.00
9/27/19	Shawn S. Amuial	Meeting with receiver to discuss structure of creditor intake	0.50	475.00	237.50
10/7/19	Trisha M. Thompson	Internal emails and conferral re: TBIS property in Oregon.	0.20	375.00	75.00
10/23/19	Trisha M. Thompson	Confer with G. Roth re: transfer of TBIS Springfield property from Portland to Miami.	0.10	375.00	37.50
12/6/19	Trisha M. Thompson	Confer with staff re: shipping TBIS assets to client.	0.10	375.00	37.50

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/10/19	Trisha M. Thompson	Confer with A. Rhodes and staff re: shipment of TBIS Springfield property to Miami office.	0.10	375.00	37.50
12/11/19	Trisha M. Thompson	Confer with A. Tuttle re: shipping TBIS Springfield property to Miami.	0.10	375.00	37.50
Total:	B130 A105	Asset Disposition Communicate (in firm)	4.60		2,099.50

B130 - Asset Disposition

A106 - Communicate (with client)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/3/18	Jose A. Casal	Review and confer with Receiver on disposition strategy for cryptocurrency.	0.40	850.00	340.00
9/11/18	Trisha M. Thompson	Review communication from creditor and forward to receiver.	0.10	325.00	32.50
9/19/18	Trisha M. Thompson	Email to client re: property from TBIS Springfield office.	0.10	325.00	32.50
10/2/18	Trisha M. Thompson	Email client copy of communications with BlockMod Enterprises re: payment.	0.10	350.00	35.00
10/24/18	Trisha M. Thompson	Email to J. Dewey re: assets remaining in Holland & Knight's possession.	0.10	350.00	35.00
11/7/18	Trisha M. Thompson	Email to client re: response to creditor inquiry.	0.10	350.00	35.00
11/12/18	Trisha M. Thompson	Email to client re: BockMod Enterprise inquiry.	0.10	350.00	35.00
12/6/18	Trisha M. Thompson	Email to receiver re: response to alleged creditor's inquiry.	0.10	350.00	35.00
12/21/18	Trisha M. Thompson	Email to client and counsel re: property from TBIS Springfield office.	0.10	350.00	35.00
8/20/19	Jose A. Casal	Conference call with Receiver on interim liquidation strategy.	0.30	890.00	267.00
Total:	B130 A106	Asset Disposition Communicate (with client)	1.50		882.00

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B130 - Asset Disposition

A107 - Communicate (other outside counsel)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/16/18	Jose A. Casal	Exchange communications with counsel for M. Stollaire regarding USB storage devices and wages.	0.40	850.00	340.00
8/31/18	Jose A. Casal	Review and exchange memoranda with Stollaire's counsel regarding return of property and Coinbase stipulation.	0.40	850.00	340.00
Total:	B130 A107	Asset Disposition Communicate (other outside counsel)	0.80		680.00

B130 - Asset Disposition

A108 - Communicate (other external)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/10/18	Trisha M. Thompson	Call with Richard at Kroll re: laptop and computer return.	0.10	325.00	32.50
7/20/18	Shawn S. Amuial	Several correspondences with former employees, throughout the day, re payment of unpaid wages.	0.60	450.00	270.00
7/20/18	Trisha M. Thompson	Communications with B. Miles.	0.10	325.00	32.50
8/15/18	Shawn S. Amuial	Communication with Well Fargo in effort to initiate outgoing wires.	0.40	450.00	180.00
9/20/18	Shawn S. Amuial	Correspondence with Richard Silver, Trisha Thompson, and Jose Casal re the return of Richard Silver's laptop	0.30	450.00	135.00
10/26/18	Shawn S. Amuial	Correspondences with Dewey, Portland Office and Kroll re the remaining assets located in Portland and plan for sale/disposition	0.40	475.00	190.00
3/14/19	Jose A. Casal	Review and exchange memoranda on status of Coinbase stipulation.	0.30	890.00	267.00
Total:	B130	Asset Disposition			

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A108	Communicate (other external)	2.20	1,107.00
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B130 - Asset Disposition

A111 - Other

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/29/18	Trisha M. Thompson	Coordinate staff inventory of property taken from TBIS Springfield office and answer questions re: same.	0.50	325.00	162.50
7/12/18	Trisha M. Thompson	Coordinate return of personal items to B. Miles; Draft letter re: same; Communications with Receiver re: remaining personal items.	0.80	325.00	260.00
7/13/18	Shawn S. Amual	Communication with former employees and banks in effort to send owed wages to former employees.	1.30	450.00	585.00
7/17/18	Shawn S. Amual	Communication with former employees in effort to send owed wages to former employees.	1.20	450.00	540.00
7/26/18	Trisha M. Thompson	Coordinate return of property to TBIS Springfield via B. Miles; Draft letter re: same; Communications to B. Miles re: same.	0.70	325.00	227.50
Total:	B130 A111	Asset Disposition Other	4.50		1,775.00

B150 - Meetings of and Communications with Creditors

A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/15/18	Shawn S. Amual	Review letter from Addis Mussa alleging his interactions with TBIS and Michael Stollaire and discuss with Joe Dewey	0.90	475.00	427.50
Total:	B150 A104	Meetings of and Communications with Creditors Review/Analyze	0.90		427.50

B150 - Meetings of and Communications with Creditors

A105 - Communicate (in firm)

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/4/18	Trisha M. Thompson	Review invoice of BlockMod Enterprise and forward to client.	0.10	325.00	32.50
8/6/18	Trisha M. Thompson	Communications with receiver and Blockmod Enterprises re: payment of claim.	0.20	325.00	65.00
11/2/18	Shawn S. Amuial	Review correspondences from receiver re: request from CORT Furniture and provide Joe with update of our communications with CORT.	0.20	475.00	95.00
Total:	B150	Meetings of and Communications with Creditors			
	A105	Communicate (in firm)	0.50		192.50

B150 - Meetings of and Communications with Creditors

A108 - Communicate (other external)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/3/18	Shawn S. Amuial	Call and correspondences with Heather Rooney re the state of TBIS and her reversed paycheck.	0.60	450.00	270.00
7/3/18	Shawn S. Amuial	Correspondences with Becky Miles relating to her reversed paycheck; attain her wire instructions	0.40	450.00	180.00
7/4/18	Shawn S. Amuial	Correspondences with Kazem Hadi re reversal of payroll.	0.20	450.00	90.00
7/24/18	Shawn S. Amuial	Correspondences with creditors via email re claims.	0.40	450.00	180.00
8/9/18	Shawn S. Amuial	Correspondences from former employees and investors.	0.40	450.00	180.00
9/12/18	Trisha M. Thompson	Draft email to BlockMod Enterprise in response to inquiry re: payment.	0.10	325.00	32.50
10/4/18	Shawn S. Amuial	Discuss reply to Perkins Coie with Joe Dewey and send email response to request for payment of legal fees	0.20	475.00	95.00
4/24/19	Shawn S. Amuial	Return phone calls to debt collection agencies	0.30	475.00	142.50

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Total:	B150	Meetings of and Communications with Creditors		
	A108	Communicate (other external)	2.60	1,170.00

B190 - Other Contested Matters

A103 - Draft/Revise

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/23/18	Jose A. Casal	Review R. Silver demand and prepare proposed response.	0.50	850.00	425.00
7/30/18	Jose A. Casal	Draft access letter to D. Brown (SEC).	0.20	850.00	170.00
8/8/18	Jose A. Casal	Draft motion to modify freeze order regarding Coinbase account.	0.70	850.00	595.00
8/8/18	Kristina S. Azlin	Attention to draft Motion to Modify Asset Freeze Order and begin modifying same to conform to local rule requirements(1.1); circulate email outline initial thoughts and rules relating to same and strategize with J. Casal regarding best procedural mechanism to accomplish desired result (.8).	1.90	720.00	1,368.00
8/9/18	Jose A. Casal	Review and edit demand letter to R. Silver regarding Coinbase.	0.30	850.00	255.00
8/10/18	Kristina S. Azlin	Attention to draft Stipulation to Modify Asset Freeze Order to allow transfer of funds from Coinbase account.	0.30	720.00	216.00
8/10/18	Shawn S. Amual	Revise stipulation requesting release of funds from Coinbase; send to Jose Casal for review.	0.40	450.00	180.00
8/14/18	Kristina S. Azlin	Update draft Stipulation to Modify Asset Freeze Order to allow transfer of funds from the Coinbase account and prepare proposed order for same.	1.10	720.00	792.00
8/15/18	Jose A. Casal	Review and revise proposed stipulation and order regarding Coinbase.	0.40	850.00	340.00
8/16/18	Shawn S. Amual	Revise stipulation to release frozen assets per the SEC's suggested revisions.	0.50	450.00	225.00
8/21/18	Kristina S.	Update draft Stipulation and proposed order to	0.30	720.00	216.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	Azlin	Modify Asset Freeze Order to allow transfer of funds from the Coinbase account of Mr. Silver.			
Total:	B190 A103	Other Contested Matters Draft/Revise	6.60		4,782.00

B190 - Other Contested Matters
A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/3/18	Trisha M. Thompson	Review receipts provided by R. Silver for alleged personal property.	0.40	325.00	130.00
7/10/18	Jose A. Casal	Review scheduling order and Stollaire answer and exchange related memoranda.	0.60	850.00	510.00
8/1/18	Jose A. Casal	Review and confer on draft stipulation concerning Coinbase accounts.	0.80	850.00	680.00
8/7/18	Jose A. Casal	Review memoranda regarding transfer of Coinbase account and motion/memoranda requirements.	0.40	850.00	340.00
8/16/18	Jose A. Casal	Review proposed modifications to Coinbase account stipulation.	0.30	850.00	255.00
5/10/19	Jose A. Casal	Review and comment of draft stipulation regarding case deadlines and consents to judgment.	0.60	890.00	534.00
5/14/19	Jose A. Casal	Review proposed consent and judgment against TBIS.	0.30	890.00	267.00
5/22/19	Jose A. Casal	Review SEC filing on consent to judgment.	0.20	890.00	178.00
5/24/19	Jose A. Casal	Review judgment against TBIS and transmit to receiver team.	0.20	890.00	178.00
Total:	B190 A104	Other Contested Matters Review/Analyze	3.80		3,072.00

B190 - Other Contested Matters
A105 - Communicate (in firm)

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/8/18	Jose A. Casal	Review and confer on turnover and order to show cause strategies regarding Coinbase account.	0.60	850.00	510.00
9/5/18	Shawn S. Amual	Correspondences with Jose Casal and Joe Dewey re motion re Coinbase and review Stollaire's attorney's response.	0.20	450.00	90.00
4/8/19	Jose A. Casal	Transmit R. Silver stipulation and confer on filing and proposed order.	0.20	890.00	178.00
Total:	B190 A105	Other Contested Matters Communicate (in firm)	1.00		778.00

B190 - Other Contested Matters
A107 - Communicate (other outside counsel)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/31/18	Jose A. Casal	Telephone conference with A. Tyler (DOJ) regarding Telegram access and prepare status memorandum.	0.20	850.00	170.00
8/15/18	Jose A. Casal	Prepare memorandum to D. Brown (SEC) regarding proposed stipulation and order on Coinbase account.	0.30	850.00	255.00
8/30/18	Jose A. Casal	Review and exchange memoranda with M. Stollaire's client regarding creditor claims, return of property and Coinbase stipulation.	0.50	850.00	425.00
10/8/18	Jose A. Casal	Exchange memoranda with Stollaire's counsel regarding status of Coinbase stipulation.	0.20	890.00	178.00
10/15/18	Jose A. Casal	Review draft 26(f) report and exchange memoranda with SEC counsel.	0.30	890.00	267.00
5/10/19	Jose A. Casal	Telephone conferences with SEC counsel on proposed bifurcated settlement and stipulation regarding case deadlines.	0.60	890.00	534.00
Total:	B190 A107	Other Contested Matters Communicate (other outside counsel)	2.10		1,829.00

B190 - Other Contested Matters

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A108 - Communicate (other external)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/9/18	Jose A. Casal	Telephone conference with R. Silver regarding Coinbase and prepare update memorandum.	0.80	850.00	680.00
8/13/18	Jose A. Casal	Exchange memoranda with R. Silver regarding stipulation and other claims.	0.30	850.00	255.00
8/22/18	Jose A. Casal	Prepare and exchange memoranda with R. Silver and Stollaire's counsel regarding Coinbase stipulation.	0.60	850.00	510.00
8/22/18	Shawn S. Amual	Correspondences with Jose Casal re Michael Stollaire's request to pay monies owed to CORT furniture.	0.30	450.00	135.00
8/23/18	Jose A. Casal	Exchange memoranda with D. Brown (SEC) and R. Silver regarding Coinbase stipulation.	0.20	850.00	170.00
Total:	B190 A108	Other Contested Matters Communicate (other external)	2.20		1,750.00

B195 - Non-Working Travel

A111 - Other

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/28/18	Trisha M. Thompson	Travel to and from Springfield, Oregon for return of personal property to former employees and subsequent delivery of unreturned property to H&K Portland office.	4.50	162.50	731.25
Total:	B195 A111	Non-Working Travel Other	4.50		731.25

B210 - Business Operations

A101 - Plan and Prepare for

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/9/18	Shawn S. Amual	Work with Joe Dewey to create template consolidated spreadsheet for all former employee requests.	0.50	450.00	225.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/12/18	Shawn S. Amual	Financial analysis of monies owed to former employees, including consolidation of data in spreadsheet form and coordination with Receiver re: same.	3.70	450.00	1,665.00
12/10/18	Shawn S. Amual	Work on updating receivership website and pulling updated docket to post on website	0.20	475.00	95.00
12/11/18	Shawn S. Amual	Work with firm paralegal and IT to pull docket, download pleadings and load onto receivership website	1.10	475.00	522.50
12/14/18	Shawn S. Amual	Finalize update to receivership website to include latest pleadings	0.20	475.00	95.00
Total:	B210 A101	Business Operations Plan and Prepare for	5.70		2,602.50

B210 - Business Operations
A102 - Research

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/3/18	Shawn S. Amual	Work with H&K team to identify accounting team for year end income and employee accounting, and coordinate conference call with firm	1.00	475.00	475.00
Total:	B210 A102	Business Operations Research	1.00		475.00

B210 - Business Operations
A103 - Draft/Revise

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/5/18	Shawn S. Amual	Draft and revise employee termination notice.	0.60	450.00	270.00
7/6/18	Shawn S. Amual	Draft and revise employee termination notice.	1.20	450.00	540.00
7/11/18	Shawn S. Amual	Work on revisions to termination notice with Joe Dewey per John Haney's California-specific labor and employment comments.	0.60	450.00	270.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
5/1/19	Shawn S. Amual	Prepare payment of Kroll invoice and discuss with receiver	0.50	475.00	237.50
12/13/19	Shawn S. Amual	Draft update to be posted on receivership website and update the website	0.40	555.00	222.00
12/18/19	Shawn S. Amual	Work with IT to finalize updated posting on receivership website and discussion with Andrew Balthazor re next steps for HitBTC action	0.60	555.00	333.00
Total:	B210 A103	Business Operations Draft/Revise	3.90		1,872.50

B210 - Business Operations A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/17/19	Shawn S. Amual	Review form 56's and POAs sent by accounting firm for Receiver's signature	0.50	475.00	237.50
1/22/19	Shawn S. Amual	Compile signed form 56, scan and send to accountants	0.30	475.00	142.50
2/12/19	Shawn S. Amual	Re-review invoices from accountant's office and discuss payment, via email, with Jose Casal	0.30	475.00	142.50
4/29/19	Shawn S. Amual	Correspondences to and from accounting firm	0.30	475.00	142.50
5/21/19	Shawn S. Amual	Re-calculate value of business (crypto) assets owned by receivership and discuss with internal team	0.40	475.00	190.00
Total:	B210 A104	Business Operations Review/Analyze	1.80		855.00

B210 - Business Operations A105 - Communicate (in firm)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/6/18	Shawn S.	Correspondences with John Haney re local	0.30	450.00	135.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	Amuial	employment law issues.			
1/15/19	Shawn S. Amuial	Correspondences with Dede Hayes re updated docket in effort to update the receivership webpage and review updated docket	0.50	475.00	237.50
3/12/19	Shawn S. Amuial	Work with IT to get receivership website back online	0.30	475.00	142.50
3/22/19	Shawn S. Amuial	Continue work with IT to restore receivership website.	0.30	475.00	142.50
4/1/19	Shawn S. Amuial	Continue follow up with IT re website outage	0.10	475.00	47.50
4/12/19	Shawn S. Amuial	Further attention to technical issues surrounding Receiver website.	0.20	475.00	95.00
4/15/19	Shawn S. Amuial	Work with IT re receivership website related issues	0.20	475.00	95.00
8/30/19	Shawn S. Amuial	Correspondences with IT re receivership website upkeep	0.20	475.00	95.00
Total:	B210 A105	Business Operations Communicate (in firm)	2.10		990.00

B210 - Business Operations

A108 - Communicate (other external)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/6/18	Shawn S. Amuial	Call and correspondences with Wells Fargo re outgoing wires.	0.30	450.00	135.00
7/9/18	Shawn S. Amuial	Correspondences with former employees as well as Wells Fargo in efforts to send wires for monies owed on reversed salary payments.	1.40	450.00	630.00
7/10/18	Shawn S. Amuial	Correspondences with former employees as well as Well Fargo in efforts to send wires for monies owed on reversed salary payments.	1.10	450.00	495.00
1/11/19	Shawn S. Amuial	Reach out to Gemini trading platform to re-activate recertification link	0.20	475.00	95.00
1/14/19	Shawn S.	Attend to trading re-certification, inclnding	1.50	475.00	712.50

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	Amual	preparation and submission via re-certification portal and related communications with Gemini Trading.			
1/15/19	Shawn S. Amual	Correspondences from Gemini	0.20	475.00	95.00
3/22/19	Shawn S. Amual	Correspondence with internal team and Metropolitan Police Department re receivership	0.50	475.00	237.50
3/28/19	Shawn S. Amual	Correspondences with accountants re W2 and work with IT to restore receivership website and review correspondences to receivership	0.50	475.00	237.50
4/3/19	Shawn S. Amual	Call and correspondence from KY state auditor re unemployment requests	0.30	475.00	142.50
4/4/19	Shawn S. Amual	Follow-up re website issues for receivership page	0.10	475.00	47.50
Total:	B210 A108	Business Operations Communicate (other external)	6.10		2,827.50

B210 - Business Operations
A110 - Manage Data/Files

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
1/7/19	Shawn S. Amual	Work on recertification for Gemini trading account	0.50	475.00	237.50
4/11/19	Shawn S. Amual	Work with IT to get receivership website back up and running and update with latest docket activity	0.20	475.00	95.00
5/31/19	Shawn S. Amual	Work with IT to maintain and update receivership website to include latest court filings	0.30	475.00	142.50
9/18/19	Shawn S. Amual	Pull updated docket and work with IT to update receivership webpage to include latest filings	0.50	475.00	237.50
Total:	B210	Business Operations			

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A110	Manage Data/Files	1.50	712.50
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B220 - Employee Benefits / Pensions

A103 - Draft/Revise

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/1/18	Shawn S. Amual	Draft termination letters to employees and reconcile pay to be accompanied with letters(1.0). Review employment contracts(.7).	1.70	450.00	765.00
8/7/18	Shawn S. Amual	Review all correspondences and requests from former employees requesting additional sums and consolidate requests into spreadsheet(2.5); track prior issued checks and wire transfers and consolidate into spreadsheet and provide updated balances and requests to Receiver (1.3).	3.80	450.00	1,710.00
Total:	B220 A103	Employee Benefits / Pensions Draft/Revise	5.50		2,475.00

B220 - Employee Benefits / Pensions

A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/2/18	Shawn S. Amual	Review correspondences from former employees throughout life of receivership to confirm amounts of unpaid wages requested (1.5); work with Receiver on associated spreadsheet reconciliation (.9).	2.40	450.00	1,080.00
8/3/18	Shawn S. Amual	Continue to review and analyze correspondences from former employees throughout life of receivership to confirm amounts of unpaid wages requested.	2.10	450.00	945.00
8/14/18	Shawn S. Amual	Reconcile all sent out payments to employees and all committed tax withholding payments.	1.20	450.00	540.00
Total:	B220 A104	Employee Benefits / Pensions Review/Analyze	5.70		2,565.00

B220 - Employee Benefits / Pensions

A108 - Communicate (other external)

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/8/18	Shawn S. Amuial	Correspondences and to and from former employees re unpaid wages and continue to update master spreadsheet of expenses accordingly.	0.30	450.00	135.00
8/13/18	Shawn S. Amuial	Correspondences with former employees and update termination letters and final paychecks.	0.40	450.00	180.00
8/15/18	Shawn S. Amuial	Several correspondences with former employees re employment, pay and termination.	0.60	450.00	270.00
8/16/18	Shawn S. Amuial	Continued correspondence with former employees regarding unpaid wages.	0.50	450.00	225.00
4/18/19	Shawn S. Amuial	Correspondences with accountant and KY unemployment office re: unemployment benefits.	0.20	475.00	95.00
4/22/19	Shawn S. Amuial	Correspondences with CPA and KY unemployment department in connection with unemployment benefits request	0.20	475.00	95.00
8/1/19	Shawn S. Amuial	Call with former employee re payment and intake provided information	0.30	475.00	142.50
10/17/19	Shawn S. Amuial	Correspondences with former TBIS employee	0.10	555.00	55.50
Total:	B220 A108	Employee Benefits / Pensions Communicate (other external)	2.60		1,198.00

B240 - Tax Issues
A102 - Research

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/27/18	Shawn S. Amuial	Research issues regarding tax withholding for employees whom have not provided a W-4.	0.70	450.00	315.00
8/16/19	Shawn S. Amuial	Work on obtaining tax information for former TBIS employee.	0.50	475.00	237.50
12/13/19	Shawn S. Amuial	Review tax subordination directive provided by SEC.	0.30	555.00	166.50

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Total:	B240 A102	Tax Issues Research	1.50	719.00
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B240 - Tax Issues
A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/27/18	Kevin E. Packman	Confer with C. Pentis re tax transcripts; confer with client re forensic accountants.	0.30	850.00	255.00
8/28/18	Shawn S. Amual	Calculate federal withholding tax amount for two employees.	0.20	450.00	90.00
10/24/18	Kevin E. Packman	Meet with client to discuss tax filings and related issues.	1.00	925.00	925.00
2/5/19	Shawn S. Amual	Log through hard drive archives to attain tax informatoin needed by accoutants and discuss with Joe Dewey	2.50	475.00	1,187.50
2/6/19	Shawn S. Amual	Continue working on tax matters in conjunction with Receiver and CPA Dimitriy Kostav in efforts to finalize tax matters for 2018.	2.50	475.00	1,187.50
2/7/19	Shawn S. Amual	Continue working with Receiver to review content in company hard drives in connection with tax matters.	3.20	475.00	1,520.00
3/1/19	Shawn S. Amual	Review/analyze information recovered by e-discovery team to obtain financial information about company in connection with taxes.	2.50	475.00	1,187.50
Total:	B240 A104	Tax Issues Review/Analyze	12.20		6,352.50

B240 - Tax Issues
A105 - Communicate (in firm)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/12/19	Shawn S. Amual	Further outreach to firm contact who can connect receivership with Intuit.	0.10	475.00	47.50
12/28/19	Trisha M.	Review DOR form sent by R. Silver and	0.10	375.00	37.50

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	Thompson	forward to H&K team.			
Total:	B240 A105	Tax Issues Communicate (in firm)	0.20		85.00

B240 - Tax Issues

A108 - Communicate (other external)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/26/18	Charles J. Pentis	Telephone conferences with IRS and H&K team regarding tax transcripts and tax issues.	1.40	430.00	602.00
12/4/18	Shawn S. Amuial	Call with potential accountant for matter to discuss case and scope of work, and discuss thereafter with Joe Dewey	0.80	475.00	380.00
2/14/19	Shawn S. Amuial	Several correspondences with former TBIS employees re W2 status	0.50	475.00	237.50
2/15/19	Shawn S. Amuial	Several calls, both internal and external, re case status and pending matters, including discussion of tax matters with Joe Dewey.	1.20	475.00	570.00
2/18/19	Shawn S. Amuial	Call and correspondence with former TBIS accountant	0.50	475.00	237.50
3/20/19	Shawn S. Amuial	Several communications throughout day with team and accountants to push forward issuance of W2s.	0.80	475.00	380.00
3/21/19	Shawn S. Amuial	Continued correspondences and review of payroll info with accountants to produce W2s	0.80	475.00	380.00
3/26/19	Shawn S. Amuial	Continued efforts around reconciling information for tax purposes	0.50	475.00	237.50
3/27/19	Shawn S. Amuial	Continued efforts around reconciling information for tax purposes	0.30	475.00	142.50
4/2/19	Shawn S. Amuial	Correspondences re W2 issues	0.30	475.00	142.50
4/4/19	Shawn S. Amuial	Correspondences re W2 issues	0.20	475.00	95.00
4/5/19	Shawn S.	Correspondences with accountants re W2's	0.10	475.00	47.50

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	Amuial				
4/9/19	Shawn S. Amuial	Several calls and correspondences with accounting firm	0.30	475.00	142.50
4/12/19	Shawn S. Amuial	Continued correspondences with accounting firm and receiver and review IRS transcripts in anticipation of sending out W2 to former employees	0.60	475.00	285.00
4/15/19	Shawn S. Amuial	Calls and correspondences from former TBIS employees and send W2 to requesting employee	0.30	475.00	142.50
Total:	B240 A108	Tax Issues Communicate (other external)	8.60		4,022.00

B240 - Tax Issues

A110 - Manage Data/Files

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
2/4/19	Shawn S. Amuial	Calls and correspondences with accountants and aggregate/review internal information pertaining to taxes in efforts to prepare W2's for employees	1.90	475.00	902.50
2/8/19	Shawn S. Amuial	Continue working with internal e-discovery team to review content of hard drive re tax information	0.70	475.00	332.50
4/3/19	Shawn S. Amuial	Review W2 provided by accountants and several follow up calls and emails both internally and externally on how to manage tax bills	1.00	475.00	475.00
Total:	B240 A110	Tax Issues Manage Data/Files	3.60		1,710.00

B310 - Claims Administration and Objections

A101 - Plan and Prepare for

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
8/30/18	Shawn S.	Meeting with Joe Dewey to discuss plan for	1.00	450.00	450.00

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	Amuial	categorizing classes of creditors and analyzing how to allocated prorata rights to assets amongst each class.			
Total:	B310 A101	Claims Administration and Objections Plan and Prepare for	1.00		450.00

B310 - Claims Administration and Objections
A102 - Research

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/26/18	Shawn S. Amuial	Research Securities Act and analyze whom likely claimants are under the act, as such pertain to T-BAR purchasers, and how damages are calculated with respect to such claimants.	0.70	450.00	315.00
Total:	B310 A102	Claims Administration and Objections Research	0.70		315.00

B310 - Claims Administration and Objections
A104 - Review/Analyze

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
7/24/18	Shawn S. Amuial	Work with Melody Grafals to analyze intake of creditor claims and requests; revise and modify spreadsheet.	0.30	450.00	135.00
8/6/18	Shawn S. Amuial	Review compiled investor intake spreadsheet and reconfigure and format data to help analyze total invested monies and location of investors.	2.00	450.00	900.00
8/10/18	Shawn S. Amuial	Review revised spreadsheet sent by Joe Dewey contemplating the next disbursements by receivership.	0.60	450.00	270.00
Total:	B310 A104	Claims Administration and Objections Review/Analyze	2.90		1,305.00

B310 - Claims Administration and Objections
A105 - Communicate (in firm)

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<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
6/9/19	Jose A. Casal	Review and comment on claims processing and priority issues.	0.30	890.00	267.00
Total:	B310 A105	Claims Administration and Objections Communicate (in firm)	0.30		267.00

B310 - Claims Administration and Objections
A106 - Communicate (with client)

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/20/18	Jose A. Casal	Review and confer with Receiver on proposed interim distribution.	0.30	890.00	267.00
Total:	B310 A106	Claims Administration and Objections Communicate (with client)	0.30		267.00

LESS COURTESY DISCOUNT:	\$	-12,984.13
TOTAL FEES FOR PROFESSIONAL SERVICES:	\$	116,857.12

Professional Summary through December 31, 2019:

<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Jose A. Casal	Partner	9.60	890.00	8,544.00
Jose A. Casal	Partner	22.60	850.00	19,210.00
Kevin E. Packman	Partner	1.00	925.00	925.00
Kevin E. Packman	Partner	0.30	850.00	255.00
Kristina S. Azlin	Partner	10.40	720.00	7,488.00
Shawn S. Amuial	Associate	12.70	555.00	7,048.50
Shawn S. Amuial	Associate	84.70	475.00	40,232.50
Shawn S. Amuial	Associate	72.90	450.00	32,805.00
Trisha M. Thompson	Associate	0.70	375.00	262.50
Trisha M. Thompson	Associate	2.10	350.00	735.00

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<u>Professional</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Trisha M. Thompson	Associate	16.20	325.00	5,265.00
Trisha M. Thompson	Associate	4.50	162.50	731.25
Adriano M. Ferreira	Paralegal	9.00	215.00	1,935.00
Anh Huynh	Paralegal	3.00	215.00	645.00
Charles J. Pentis	Paralegal	1.40	430.00	602.00
Delia M. Hayes	Paralegal	0.50	285.00	142.50
Delia M. Hayes	Paralegal	3.60	275.00	990.00
Shannan E. Whalen	Paralegal	0.20	300.00	60.00
Sharon K. O'Dowd	Paralegal	6.90	275.00	1,897.50
Jacqueline Norton	Special Assistant	0.30	225.00	67.50
				<u>129,841.25</u>

TASK SUMMARY CURRENT INVOICE

FEE TASK SUMMARY

<u>Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
B110	Case Administration	44.20	21,930.50
B120	Asset Analysis and Recovery	77.90	38,524.00
B130	Asset Disposition	49.10	22,589.00
B150	Meetings of and Communications with Creditors	4.00	1,790.00
B190	Other Contested Matters	15.70	12,211.00
B195	Non-Working Travel	4.50	731.25
B210	Business Operations	22.10	10,335.00
B220	Employee Benefits / Pensions	13.80	6,238.00
B240	Tax Issues	26.10	12,888.50
B310	Claims Administration and Objections	5.20	2,604.00

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<u>Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
TOTAL:		262.60	129,841.25

Reimbursable costs through December 31, 2019:

<u>Date</u>	<u>Description</u>	<u>Amount</u>
6/21/18	VENDOR: Jose A. Casal INVOICE#: 2645468907240903 DATE: 7/23/2018 Jose A Casal; Miscellaneous; For Motion Pro Hac Vice; 06/21/2018	19.00
6/23/18	VENDOR: Legal Support Network LLC INVOICE#: 975 DATE: 6/23/2018 Securities Exchange/Filing. re: Securities Exchange.	45.25
6/25/18	VENDOR: Clerk of the Court INVOICE#: 205802 DATE: 6/25/2018 Obtain certificate of good standing for motion for pro hac vice	19.00
6/26/18	VENDOR: Clerk of the Court INVOICE#: 205801 DATE: 6/26/2018 Obtain a certificate of good standing for motion pro hac vice	19.00
6/30/18	VENDOR: Legal Support Network LLC INVOICE#: 1527 DATE: 6/30/2018 ST Shot filing	22.75
7/9/18	VENDOR: Kristina S. Azlin INVOICE#: 2620623207160904 DATE: 7/11/2018 Kristina Starr Azlin; Court Fees; Application of Non-resident Attorney Mitchell E. Herr to Appear Pro Hac Vice on behalf of receiver Josias Dewey; 07/09/2018	400.00
7/10/18	Federal Express - Invoice # 6-242-93097 - Becky Miles - 07/10/18	34.11
7/12/18	Federal Express - Invoice # 6-251-12759 - Becky Miles - 07/12/18	25.21
7/14/18	VENDOR: Legal Support Network LLC INVOICE#: 2338 DATE: 7/14/2018 E-file CC filing re: Application Pro Havc Order	30.75
7/16/18	UPS-Tracking number:1Z4A065R1397976311-Date:2018-07-16-	15.73

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<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Receiver Name:Andrew B. Holmes, Es-Receiver Company Name:Holmes, Taylor, Scott & Jones LLP-Service Description:Next Day Air Saver Commercial	
7/16/18	Cancellation of: VENDOR: Clerk of the Court INVOICE#: 205801 DATE: 6/26/2018 Obtain a certificate of good standing for motion pro hac vice	-19.00
7/17/18	Cancellation of: VENDOR: Clerk of the Court INVOICE#: 205802 DATE: 6/25/2018 Obtain certificate of good standing for motion for pro hac vice	-19.00
7/17/18	UPS-Tracking number:1Z97057X4298865860-Date:2018-07-17- Receiver Name:-Receiver Company Name:Becky Miles-Service Description:Ground Residential	20.54
7/17/18	VENDOR: Kristina S. Azlin INVOICE#: 2636450307200907 DATE: 7/18/2018 Kristina Starr Azlin; Court Fees; Filing Fees for Jose Casal's Pro Hac Vice Application .; 07/17/2018	400.00
7/19/18	Federal Express - Invoice # 6-258-29819 - Martha Breed - 07/19/18	19.77
7/19/18	Federal Express - Invoice # 6-258-29819 - Daniel Bereczki - 07/19/18	19.77
7/19/18	Federal Express - Invoice # 6-258-29819 - David Guck - 07/19/18	19.77
7/19/18	Federal Express - Invoice # 6-258-29819 - Ying Liu - 07/19/18	22.01
7/19/18	Federal Express - Invoice # 6-258-29819 - Leyou Hong - 07/19/18	22.01
7/19/18	Federal Express - Invoice # 6-258-29819 - Kazem Hadi - 07/19/18	17.56
7/19/18	Federal Express - Invoice # 6-258-29819 - Bryan Levi - 07/19/18	19.55
7/19/18	Federal Express - Invoice # 6-258-29819 - Aaron Lefkowitz -	19.77

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<u>Date</u>	<u>Description</u>	<u>Amount</u>
	07/19/18	
7/19/18	Federal Express - Invoice # 1-720-93559 - Tina Mitchell - 07/19/18	124.16
7/20/18	Federal Express - Invoice # 6-258-29819 - Nathan Ross - 07/20/18	22.01
7/20/18	Federal Express - Invoice # 6-258-29819 - Deepanshu Tyagi - 07/20/18	22.01
7/20/18	Federal Express - Invoice # 6-258-29819 - Dallin Christensen - 07/20/18	22.01
7/20/18	Federal Express - Invoice # 6-258-29819 - Jack Dawson - 07/20/18	22.01
7/20/18	Federal Express - Invoice # 6-258-29819 - Staci Dawson - 07/20/18	22.01
7/21/18	VENDOR: Legal Support Network LLC INVOICE#: 2907 DATE: 7/21/2018 SD CC Court Srvs Appl order re: Securities v Titanium	55.00
7/26/18	UPS-Tracking number:1Z97057X4294353036-Date:2018-07-26-Receiver Name:-Receiver Company Name:Becky Miles-Service Description:Ground Residential	23.52
7/26/18	UPS-Tracking number:1Z97057X4294083846-Date:2018-07-26-Receiver Name:-Receiver Company Name:Becky Miles-Service Description:Ground Residential	19.44
7/26/18	UPS-Tracking number:1Z97057X4291200625-Date:2018-07-26-Receiver Name:-Receiver Company Name:Becky Miles-Service Description:Ground Residential	21.34
7/27/18	UPS-Tracking number:1Z4A065R0198589037-Date:2018-07-27-Receiver Name:-Receiver Company Name:Dallin Christensen-Service Description:Next Day Air Residential	14.37

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8/14/18	Federal Express - Invoice # 6-278-52421 - Spencer Howell - 08/14/18	23.79
8/14/18	Federal Express - Invoice # 6-278-52421 - Alex Koch - 08/14/18	21.96
8/14/18	Federal Express - Invoice # 6-278-52421 - Ying Liu - 08/14/18	21.96
8/14/18	Federal Express - Invoice # 6-278-52421 - Leyou Hong - 08/14/18	21.96
8/17/18	Federal Express - Invoice 6-286-38271- Deepanshu Tyagi - 08/17/2018	21.74
8/28/18	Federal Express - Invoice # 6-293-37768 - Becky Miles - 08/28/18	26.45
8/28/18	Federal Express - Invoice # 6-293-37768 - Yong Ha Jeong - 08/28/18	21.74
9/13/18	First Legal Network,LLC - Invoice # 10171149 - Holmes, Taylor, Scott & Jones LLP - 09/13/18	15.81
3/3/19	VENDOR: Legal Support Network LLC INVOICE#: 18340 DATE: 3/3/2019 E-file CC filing	90.75
3/24/19	VENDOR: Legal Support Network LLC INVOICE#: 19725 DATE: 3/24/2019 SD CC Court Srvc	56.00
4/7/19	VENDOR: Legal Support Network LLC INVOICE#: 20636 DATE: 4/7/2019 SD CC Court srvc.	55.00
4/14/19	VENDOR: Legal Support Network LLC INVOICE#: 20978 DATE: 4/14/2019 Court Service re: Dewey, Josias N. as Receiver for Tataniu	57.00
	Online Research	118.20
	Westlaw	4,470.70

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<u>Date</u>	<u>Description</u>	<u>Amount</u>
	TOTAL REIMBURSABLE COSTS:	\$ <u>6,564.49</u>
	FEES FOR PROFESSIONAL SERVICES:	\$ 129,841.25
	LESS COURTESY DISCOUNT:	\$ <u>-12,984.13</u>
	TOTAL PROFESSIONAL FEES:	\$ 116,857.12
	REIMBURSABLE COSTS:	\$ 6,564.49
	TOTAL DUE THIS INVOICE:	\$ <u>123,421.61</u>
	(U.S. Dollar)	

EXHIBIT E

SUMMARY OF EXPENSES

I. Summary of Charges

The standard rate charged for photocopying is \$.15 per page. The standard rate charged for outgoing facsimile transmissions is \$1.00 per page. NO CHARGES ARE INCURRED FOR INCOMING FACSIMILE TRANSMISSIONS.

II. Summary of Expenses

<u>Expense Category</u>	<u>Cost</u>
Accounting Services ²	\$10,170.00
Filing Fees	\$1,231.50
Online Research	\$4,588.90
Overnight Delivery	\$744.09
TOTAL:	\$16,734.49

See attached backup for additional detail on expenses incurred by H&K, and Exhibit E-1 for further detail on Accounting Services provided by Grobstein Teeple LLP.

² See attached invoice from Grobstein Teeple LLP.

Date	Timekeeper Name	Category	Amount	Detail
6/21/2018	Casal, Jose A.	Filing Fees	\$19.00	VENDOR: Jose A. Casal INVOICE#: 2645468907240903 DATE: 7/23/2018 Jose A Casal; Miscellaneous; For Motion Pro Hac Vice; 06/21/2018
6/23/2018	Perez, Rosanna	Filing Fees	\$45.25	VENDOR: Legal Support Network LLC INVOICE#: 975 DATE: 6/23/2018 Securities Exchange/Filing. re: Securities Exchange.
6/25/2018	Casal, Jose A.	Filing Fees	\$19.00	VENDOR: Clerk of the Court INVOICE#: 205802 DATE: 6/25/2018 Obtain certificate of good standing for motion for pro hac vice
6/26/2018	Casal, Jose A.	Filing Fees	\$19.00	VENDOR: Clerk of the Court INVOICE#: 205801 DATE: 6/26/2018 Obtain a certificate of good standing for motion pro hac vice
6/30/2018	Perez, Rosanna	Filing Fees	\$22.75	VENDOR: Legal Support Network LLC INVOICE#: 1527 DATE: 6/30/2018 ST Shot filing
7/9/2018	Azlin, Kristina S.	Filing Fees	\$400.00	VENDOR: Kristina S. Azlin INVOICE#: 2620623207160904 DATE: 7/11/2018 Kristina Starr Azlin; Court Fees; Application of Non-resident Attorney Mitchell E. Herr to Appear Pro Hac Vice on behalf of receiver Josias Dewey; 07/09/2018
7/14/2018	Mendez, Ericka S.	Filing Fees	\$30.75	VENDOR: Legal Support Network LLC INVOICE#: 2338 DATE: 7/14/2018 E-file CC filing re: Application Pro Havc Order
7/16/2018	Casal, Jose A.	Filing Fees	(\$19.00)	Cancellation of: VENDOR: Clerk of the Court INVOICE#: 205801 DATE: 6/26/2018 Obtain a certificate of good standing for motion pro hac vice
7/17/2018	Azlin, Kristina S.	Filing Fees	\$400.00	VENDOR: Kristina S. Azlin INVOICE#: 2636450307200907 DATE: 7/18/2018 Kristina Starr Azlin; Court Fees; Filing Fees for Jose Casal's Pro Hac Vice Application .; 07/17/2018
7/17/2018	Casal, Jose A.	Filing Fees	(\$19.00)	Cancellation of: VENDOR: Clerk of the Court INVOICE#: 205802 DATE: 6/25/2018 Obtain certificate of good standing for motion for pro hac vice
7/21/2018	Mendez, Ericka S.	Filing Fees	\$55.00	VENDOR: Legal Support Network LLC INVOICE#: 2907 DATE: 7/21/2018 SD CC Court Srvc Appl order re: Securities v Titanium
3/3/2019	Perez, Rosanna	Filing Fees	\$90.75	VENDOR: Legal Support Network LLC INVOICE#: 18340 DATE: 3/3/2019 E-file CC filing
3/24/2019	Mendez, Ericka S.	Filing Fees	\$56.00	VENDOR: Legal Support Network LLC INVOICE#: 19725 DATE: 3/24/2019 SD CC Court Srvc
4/7/2019	Mendez, Ericka S.	Filing Fees	\$55.00	VENDOR: Legal Support Network LLC INVOICE#: 20636 DATE: 4/7/2019 SD CC Court srvc.
4/14/2019	Mendez, Ericka S.	Filing Fees	\$57.00	VENDOR: Legal Support Network LLC INVOICE#: 20978 DATE: 4/14/2019 Court Service re: Dewey, Josias N. as Receiver for Tataniui
		Filing Fees Total	\$1,231.50	
7/10/2018	Azlin, Kristina S.	Online Research	\$0.60	Pacer--kazlin235238 Kristina Azlin (4596067)
7/10/2018	Hayes, Delia M.	Online Research	\$54.90	Pacer--falling4star Delia Hayes (4676137)
7/11/2018	Hayes, Delia M.	Online Research	\$33.40	Pacer--falling4star Delia Hayes (4676137)
7/18/2018	Azlin, Kristina S.	Online Research	\$0.90	Pacer--kazlin235238 Kristina Azlin (4596067)
9/18/2018	Whalen, Shannan E.	Online Research	\$6.50	Pacer--shanpacer Shannan Whalen (4667155)
10/1/2018	Azlin, Kristina S.	Online Research	\$414.50	Westlaw - AZLIN,KRISTINA - 10/01/2018 -
10/15/2018	Balthazor, Andrew W.	Online Research	\$333.90	Westlaw - BALTHAZOR,ANDREW - 10/15/2018 -
10/16/2018	Azlin, Kristina S.	Online Research	\$391.00	Westlaw - AZLIN,KRISTINA - 10/16/2018 -
10/16/2018	Balthazor, Andrew W.	Online Research	\$0.50	Westlaw - BALTHAZOR,ANDREW - 10/16/2018 -
10/22/2018	Azlin, Kristina S.	Online Research	\$0.60	Pacer--kazlin235238 Kristina Azlin (4596067)
12/11/2018	Hayes, Delia M.	Online Research	\$0.20	Pacer--falling4star Delia Hayes (4676137)
12/11/2018	Hayes, Delia M.	Online Research	\$0.60	Pacer--falling4star Delia Hayes (4676137)
1/15/2019	Hayes, Delia M.	Online Research	\$0.60	Pacer--falling4star Delia Hayes (4676137)
2/10/2019	Azlin, Kristina S.	Online Research	\$97.59	Westlaw - AZLIN,KRISTINA - 02/10/2019 -
2/11/2019	Azlin, Kristina S.	Online Research	\$573.59	Westlaw - AZLIN,KRISTINA - 02/11/2019 -
2/12/2019	Hayes, Delia M.	Online Research	\$1.70	Pacer--falling4star Delia Hayes (4676137)
3/18/2019	Azlin, Kristina S.	Online Research	\$0.40	Pacer--kazlin235238 Kristina Azlin (4596067)
4/3/2019	Azlin, Kristina S.	Online Research	\$0.60	Pacer--kazlin235238 Kristina Azlin (4596067)
4/4/2019	Hayes, Delia M.	Online Research	\$8.90	Pacer--falling4star Delia Hayes (4676137)
4/9/2019	Azlin, Kristina S.	Online Research	\$1.90	Pacer--kazlin235238 Kristina Azlin (4596067)
5/15/2019	Hayes, Delia M.	Online Research	\$4.80	Pacer--falling4star Delia Hayes (4676137)
6/8/2019	Balthazor, Andrew W.	Online Research	\$294.33	Westlaw - BALTHAZOR,ANDREW - 06/08/2019 -
6/12/2019	Alvarez, Nicole S.	Online Research	\$436.76	Westlaw - ALVAREZ,NICOLE - 06/12/2019 -
6/18/2019	Alvarez, Nicole S.	Online Research	\$523.35	Westlaw - ALVAREZ,NICOLE - 06/18/2019 -
6/19/2019	Balthazor, Andrew W.	Online Research	\$206.43	Westlaw - BALTHAZOR,ANDREW - 06/19/2019 -
6/19/2019	Alvarez, Nicole S.	Online Research	\$40.50	Westlaw - ALVAREZ,NICOLE - 06/19/2019 -
6/23/2019	Balthazor, Andrew W.	Online Research	\$400.49	Westlaw - BALTHAZOR,ANDREW - 06/23/2019 -
9/3/2019	Melzer, Nicholas B. ^	Online Research	\$0.80	Pacer--melzer62 Nicholas Melzer (4670940)
9/10/2019	Balthazor, Andrew W.	Online Research	\$403.50	Westlaw - BALTHAZOR,ANDREW - 09/10/2019 -

Date	Timekeeper Name	Category	Amount	Detail
9/18/2019	Hayes, Delia M.	Online Research	\$0.80	Pacer--falling4star Delia Hayes (4676137)
12/3/2019	Balthazor, Andrew W.	Online Research	\$204.59	Westlaw - BALTHAZOR,ANDREW - 12/03/2019 -
12/30/2019	Balthazor, Andrew W.	Online Research	\$149.67	Westlaw - BALTHAZOR,ANDREW - 12/30/2019 -
		Online Research Total	\$4,588.90	
7/10/2018	Casal, Jose A.	Overnight Delivery	\$34.11	Federal Express - Invoice # 6-242-93097 - Becky Miles - 07/10/18
7/12/2018	Casal, Jose A.	Overnight Delivery	\$25.21	Federal Express - Invoice # 6-251-12759 - Becky Miles - 07/12/18
7/16/2018	Casal, Jose A.	Overnight Delivery	\$15.73	UPS-Tracking number:1Z4A065R1397976311-Date:2018-07-16-Receiver Name:Andrew B. Holmes, Es-Receiver Company Name:Holmes, Taylor, Scott & Jones LLP-Service Description:Next Day Air Saver Commercial
7/17/2018	Casal, Jose A.	Overnight Delivery	\$20.54	UPS-Tracking number:1Z97057X4298865860-Date:2018-07-17-Receiver Name:-Receiver Company Name:Becky Miles-Service Description:Ground Residential
7/19/2018	Casal, Jose A.	Overnight Delivery	\$19.77	Federal Express - Invoice # 6-258-29819 - Martha Breed - 07/19/18
7/19/2018	Casal, Jose A.	Overnight Delivery	\$19.77	Federal Express - Invoice # 6-258-29819 - Daniel Bereczki - 07/19/18
7/19/2018	Casal, Jose A.	Overnight Delivery	\$19.77	Federal Express - Invoice # 6-258-29819 - David Guck - 07/19/18
7/19/2018	Casal, Jose A.	Overnight Delivery	\$22.01	Federal Express - Invoice # 6-258-29819 - Ying Liu - 07/19/18
7/19/2018	Casal, Jose A.	Overnight Delivery	\$22.01	Federal Express - Invoice # 6-258-29819 - Leyou Hong - 07/19/18
7/19/2018	Casal, Jose A.	Overnight Delivery	\$17.56	Federal Express - Invoice # 6-258-29819 - Kazem Hadi - 07/19/18
7/19/2018	Casal, Jose A.	Overnight Delivery	\$19.55	Federal Express - Invoice # 6-258-29819 - Bryan Levi - 07/19/18
7/19/2018	Casal, Jose A.	Overnight Delivery	\$19.77	Federal Express - Invoice # 6-258-29819 - Aaron Lefkowitz - 07/19/18
7/19/2018	Casal, Jose A.	Overnight Delivery	\$124.16	Federal Express - Invoice # 1-720-93559 - Tina Mitchell - 07/19/18
7/20/2018	Casal, Jose A.	Overnight Delivery	\$22.01	Federal Express - Invoice # 6-258-29819 - Nathan Ross - 07/20/18
7/20/2018	Casal, Jose A.	Overnight Delivery	\$22.01	Federal Express - Invoice # 6-258-29819 - Deepanshu Tyagi - 07/20/18
7/20/2018	Casal, Jose A.	Overnight Delivery	\$22.01	Federal Express - Invoice # 6-258-29819 - Dallin Christensen - 07/20/18
7/20/2018	Casal, Jose A.	Overnight Delivery	\$22.01	Federal Express - Invoice # 6-258-29819 - Jack Dawson - 07/20/18
7/20/2018	Casal, Jose A.	Overnight Delivery	\$22.01	Federal Express - Invoice # 6-258-29819 - Staci Dawson - 07/20/18
7/26/2018	Casal, Jose A.	Overnight Delivery	\$23.52	UPS-Tracking number:1Z97057X4294353036-Date:2018-07-26-Receiver Name:-Receiver Company Name:Becky Miles-Service Description:Ground Residential
7/26/2018	Casal, Jose A.	Overnight Delivery	\$19.44	UPS-Tracking number:1Z97057X4294083846-Date:2018-07-26-Receiver Name:-Receiver Company Name:Becky Miles-Service Description:Ground Residential
7/26/2018	Casal, Jose A.	Overnight Delivery	\$21.34	UPS-Tracking number:1Z97057X4291200625-Date:2018-07-26-Receiver Name:-Receiver Company Name:Becky Miles-Service Description:Ground Residential
7/27/2018	Casal, Jose A.	Overnight Delivery	\$14.37	UPS-Tracking number:1Z4A065R0198589037-Date:2018-07-27-Receiver Name:-Receiver Company Name:Dallin Christensen-Service Description:Next Day Air Residential
8/14/2018	Casal, Jose A.	Overnight Delivery	\$23.79	Federal Express - Invoice # 6-278-52421 - Spencer Howell - 08/14/18
8/14/2018	Casal, Jose A.	Overnight Delivery	\$21.96	Federal Express - Invoice # 6-278-52421 - Alex Koch - 08/14/18
8/14/2018	Casal, Jose A.	Overnight Delivery	\$21.96	Federal Express - Invoice # 6-278-52421 - Ying Liu - 08/14/18
8/14/2018	Casal, Jose A.	Overnight Delivery	\$21.96	Federal Express - Invoice # 6-278-52421 - Leyou Hong - 08/14/18
8/17/2018	Dewey, Josias	Overnight Delivery	\$21.74	Federal Express - Invoice 6-286-38271- Deepanshu Tyagi - 08/17/2018
8/28/2018	Casal, Jose A.	Overnight Delivery	\$26.45	Federal Express - Invoice # 6-293-37768 - Becky Miles - 08/28/18
8/28/2018	Casal, Jose A.	Overnight Delivery	\$21.74	Federal Express - Invoice # 6-293-37768 - Yong Ha Jeong - 08/28/18
9/13/2018	Casal, Jose A.	Overnight Delivery	\$15.81	First Legal Network,LLC - Invoice # 10171149 - Holmes, Taylor, Scott & Jones LLP - 09/13/18
		Overnight Delivery Total	\$744.09	
9/13/2019		Accounting Services	\$ 10,170.00	Grobstein Teeple LLP - Invoice No. 36481 dated Sep 13, 2019
		Accounting Services Total	\$ 10,170.00	
		Grand Total	\$ 16,734.49	

EXHIBIT E-1

DETAIL ON ACCOUNTING SERVICES
PROVIDED BY GROBSTEIN TEEPLE LLP

SUMMARY OF ACCOUNTING FEES BY PROFESSIONAL

Name	Title	Office Location	Hourly Billing Rate	Total Hours	Total Fees
Eddie Shamas	Partner	Woodland Hills	\$300	19.9	\$5,970.00
Eddie Shamas	Partner	Woodland Hills	\$275	0.4	\$110.00
Lucia Mier	Consultant	Woodland Hills	\$195	9.6	\$1,872.00
Lindsay Lopez	Consultant	Woodland Hills	\$125	8.3	\$1,037.50
Lindsay Lopez	Consultant	Woodland Hills	\$115	1.3	\$149.50
Lucy Demirdzhyan	Consultant	Woodland Hills	\$140	1.0	\$140.00
Andrew Segura	Consultant	Woodland Hills	\$135	6.6	\$891.00
TOTAL:				47.10	\$10,170.00

Overall Total: \$10,170.00

Professional Fees: \$10,170.00

Total Hours: 47.10

Blended Rate: \$215.92

SUMMARY OF ACCOUNTING FEES BY TASK CATEGORY

Task Code	Description	Total Hours	Total Fees
1	Accounting services	47.1	\$10,170.00
	TOTAL:	47.1	\$10,170.00

Grobstein Teeple LLP

23832 Rockfield Blvd.
Suite 245
Lake Forest, CA 92630
949-298-6620
info@gtllp.com



Josias Dewey, Receiver

701 Brickell Avenue, Suite 3300
Miami, FL 33131

Invoice

Invoice Date: Sep 13, 2019
Invoice Num: 36481
Billing Through: Sep 13, 2019

IN RE: SEC v. Titanium

Professional Services:

<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
001 - Accounting Services					
12/12/2018	EXS	Discussion with HBG on POA's and requirements.	275.00	0.40	\$ 110.00
12/17/2018	LNL	Preparation of Power of Attorney forms for federal, and the states of California, Oregon, and Texas. Preparation of Form 56.	115.00	1.30	\$ 149.50
01/07/2019	LNL	Preparation of Power of Attorney's for federal, CA, OR, TX, and Form 56 with additional information for Receiver.	125.00	1.00	\$ 125.00
01/22/2019	LNL	CA FTB File Power of Attorney, submitted signed POA and appointment of receiver.	125.00	1.20	\$ 150.00
01/23/2019	LNL	Contacted Texas Comptroller Office and submitted POA.	125.00	0.40	\$ 50.00
01/28/2019	LNL	Correspondence with TX comptroller office regarding POA and missing EIN.	125.00	0.50	\$ 62.50
01/29/2019	LNL	Contacting TX for tax transcripts.	125.00	0.20	\$ 25.00
01/29/2019	LNL	Submitted POA to IRS and contacted FTB regarding rejection of POA.	125.00	1.10	\$ 137.50
01/31/2019	LNL	Review with ES on status of POAs for tax transcripts	125.00	0.20	\$ 25.00
01/31/2019	EXS	Call with IRS to obtain copies of payroll tax transcripts. Multiple attempts to reach IRS.	300.00	1.80	\$ 540.00
02/05/2019	LNL	Preparation and submission of Form OR-PRR for public records. Updated POA	125.00	0.80	\$ 100.00
03/15/2019	LXM	Reviewed claim reports to prepare payroll tax and w2 forms.	195.00	0.60	\$ 117.00
03/15/2019	EXS	Review of payroll schedules and discuss preparation of W2's with LM	300.00	0.70	\$ 210.00
03/21/2019	LNL	Correspondence regarding transcripts both federal and all states.	125.00	1.10	\$ 137.50
03/21/2019	EXS	Review of schedules provided by client. Review of states with filing requirements.	300.00	1.60	\$ 480.00
03/22/2019	LNL	Correspondence with EDD officials and review with LM.	125.00	0.70	\$ 87.50

OUR REMITTANCE ADDRESS HAS CHANGED

Please mail payments to:
Grobstein Teeple, LLP
23832 Rockfield Blvd., Suite 245
Lake Forest, CA 92630

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IN RE: SEC v. Titanium

03/23/2019	LXM	Reviewing payroll reports provided by clients to process W2s	195.00	0.70	\$ 136.50
03/25/2019	LXM	Going over W2 processing with Andrew	195.00	0.70	\$ 136.50
03/25/2019	AMS	W-2 inputs for client's employees.	135.00	2.50	\$ 337.50
03/25/2019	AMS	W-2 inputs for client's employees.	135.00	2.80	\$ 378.00
03/26/2019	LNL	Correspondence with Oregon regarding payroll tax transcripts (.5). Reviewed with LM and corresponded with CA for payroll tax transcripts (.3).	125.00	0.80	\$ 100.00
03/27/2019	LNL	Correspondence regarding payroll tax.	125.00	0.30	\$ 37.50
03/27/2019	LXM	Contacting OR and CA to retrieve account numbers.(60) Reviewing OR payroll filing status (.30)	195.00	0.90	\$ 175.50
03/27/2019	EXS	Updated client on status of W2's and summarized the status of state filings.	300.00	1.20	\$ 360.00
03/29/2019	LXM	Revising state wages	195.00	1.30	\$ 253.50
03/29/2019	LD	Verification and tie out of employee W2 information.	140.00	1.00	\$ 140.00
04/01/2019	LXM	Revising W2s	195.00	0.60	\$ 117.00
04/01/2019	EXS	Review of W2 info and assisted in properly accounting for and preparing W2's.	300.00	2.50	\$ 750.00
04/02/2019	LXM	Calculating payroll tax liability for 2018	195.00	0.40	\$ 78.00
04/03/2019	LXM	Revised W2s addresses.	195.00	0.20	\$ 39.00
04/03/2019	EXS	Review of payroll items.	300.00	0.80	\$ 240.00
04/04/2019	EXS	Review of update W2's.	300.00	0.50	\$ 150.00
04/09/2019	EXS	Calls with Shawn, research priority payment, and prepared email of findings.	300.00	1.90	\$ 570.00
04/18/2019	EXS	Review of post-petition payroll.	300.00	2.20	\$ 660.00
04/19/2019	LXM	With ES regarding payroll tax for KY.	195.00	0.40	\$ 78.00
04/19/2019	AMS	Receivership payroll data entries.	135.00	1.30	\$ 175.50
04/22/2019	LXM	Telephone with KY unemployment officer	195.00	0.40	\$ 78.00

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Lake Forest, CA 92630

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04/24/2019	EXS	Discuss with LM regarding KY payroll tax filings.	300.00	0.50	\$ 150.00
04/25/2019	LXM	Prepared quarterlies for KY	195.00	1.00	\$ 195.00
04/26/2019	LXM	Communications regarding payroll filings	195.00	0.40	\$ 78.00
04/30/2019	EXS	Emails with Shawn regarding update on KY issue.	300.00	0.30	\$ 90.00
05/02/2019	EXS	Review of pre and post petition payments for each state and IRS.	300.00	1.20	\$ 360.00
05/09/2019	LXM	Corrected payroll tax schedules for pre and post receivership	195.00	0.70	\$ 136.50
05/09/2019	EXS	Review of reconciliations for pre and post payroll.	300.00	1.40	\$ 420.00
05/10/2019	EXS	Discussions with Lucia on missing information and how to address these items.	300.00	0.60	\$ 180.00
05/22/2019	EXS	Review of tax liability for pre and post period. Tie out all schedules, payments, wires, and state tax calculations.	300.00	2.70	\$ 810.00
05/22/2019	LXM	Recalculating prepetition payroll tax	195.00	1.30	\$ 253.50

001 - Accounting Services Total: 47.10 \$10,170.00

Total Professional Services Amount: 47.10 \$10,170.00

Total Fees: \$ 10,170.00

Amount Due This Invoice: \$ 10,170.00

OUR REMITTANCE ADDRESS HAS CHANGED

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Grobstein Teeple, LLP
23832 Rockfield Blvd., Suite 245
Lake Forest, CA 92630